

Public Consultation on the proposal for a revision of Regulation (EU) No 1025/2012, also called the ‘EU Standardisation Regulation’

ECOS feedback

A Introduction

Purpose of this public consultation

This consultation relates to the proposal for a revision of [Regulation \(EU\) No 1025/2012](#), also called the ‘EU Standardisation Regulation’. The Standardisation Regulation sets the legal basis for using standardisation to support EU legislation and policies, governing how the European Standardisation System contributes to the Single Market and to other EU priorities. It defines the roles of European Standardisation Organisations (ESOs) (CEN, CENELEC and ETSI), National Standardisation Bodies (NSBs), Member States and the Commission in the development of European standards (with specific provisions dedicated to the category of harmonised standards, which play a crucial role in the Single Market) and other standardisation deliverables (e.g., technical specifications), and how stakeholders can participate in the process. European standards play an important part in the functioning of the Single Market by aligning national standards and preventing multiple and potentially contradicting national approaches to standards. Harmonised standards are a specific type of European standards, which help businesses apply the requirements of EU law by providing a presumption of conformity to products respecting them.

The Commission announced that it would revise the Standardisation Regulation in the [2025 EU Competitiveness Compass](#), with the aim of making standard-setting processes ‘faster and more accessible, in particular for SMEs and startups’. As recognised in the [2022 EU Standardisation Strategy](#), the EU’s competitiveness, technological sovereignty and ability to protect its values and interests increasingly rely on its ability to deliver fast and accessible harmonised standards and on its influence as a global standard-setter. The results of the recent [Evaluation of Regulation \(EU\) 1025/2012](#) showed that the Regulation has improved the delivery of (harmonised) standards for EU policy purposes. Yet, major challenges remain, and the framework struggles to meet evolving market and policy needs. These challenges relate in particular to the speed and responsiveness to innovation of the European standardisation system, balanced stakeholder participation, accessibility of (harmonised) standards and the EU’s impact on international standardisation. The Commission will carry out an impact assessment to assess potential policy options to address these challenges, their possible effects and viability.

The focus of this consultation is specifically on standards developed to support EU law or policies, including harmonised standards (rather than other industry standards).

B About you

1 Language of my contribution *

- English

2 I am giving my contribution as *

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

6 Scope

- International
- Local
- National
- Regional

7 Level of governance*

- Local Authority
- Local Agency

8 Level of governance*

- Parliament
- Authority
- Agency

9 Organisation name

255 character(s) maximum

ECOS – Environmental Coalition on Standards

10 Organisation size*

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

11 Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

- 96668093651-33

12 Country of origin *

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- **Belgium**

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published.** Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

13 Contribution publication privacy settings*

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- Anonymous

The type of respondent that you responded to this consultation as, your country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself.

- **Public**

Your name, the type of respondent that you responded to this consultation as, your country of origin and your contribution will be published.

14 Contribution publication privacy settings*

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

- **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

- I agree with the personal data protection provisions

C Your organisation/business

15 What is the main economic activity of your organisation?

- **Agriculture, Forestry and Fishing**
- **Mining and Quarrying**
- **Manufacturing**
- **Electricity, Gas, Steam and Air Conditioning Supply**

- Water Supply; Sewerage, Waste Management and Remediation Activities
- Construction

16 Where do you do business?

- I do business [my business partners / target audience is] mostly in my country, which is in the EU
- I do business [my business partners / target audience is] mostly in the EU
- I do business [my business partners / target audience is] in the EU and outside of the EU
- I do business [my business partners / target audience is] mostly outside of the EU

D Involvement in standardisation

17 How familiar are you with the European Standardisation System (ESS) and standardisation practices in general?

Maximum 1 selection(s)

- No or limited knowledge
- Moderate knowledge
- Expert knowledge

18 What is your involvement in European standardisation?

Select all that apply

- My organisation uses harmonised standards
- My organisation uses other types of European standardisation deliverables I participate in technical work on standardisation
- I represent the interests of organisations involved in standardisation My organisation is active in education and/or research relating to standardisation Other

19 Please specify

ECOS is one of European stakeholders Organisations referred to in Article 5 and Annex III of the regulation, responsible for representing environmental interests.

20 Why does your organisation use standards?

N/A

- Other

ECOS as an organisation does not use the standards. ECOS participates to standardisation to ensure the environmental interests are considered during the development of standards.

21 Why does your organisation use other standardisation deliverables (e.g. European standards, technical specifications, technical reports, workshop agreements)?

Please rank the reasons from most important to least important.

- N/A
- Other

ECOS as an organisation does not use other standardisation deliverables. ECOS participates to standardisation to ensure the environmental interests are considered during the development of standardisation deliverables.

22 In your organisation, what is the estimated yearly number of full-time equivalent (FTE) staff participating in standardisation activities?

16 equivalent FTE staff are participating to standardisation activities. In addition to its full time staff, ECOS subcontracts external technical experts to ensure the specific expertise required for the standardisation topic is provided in standardisation technical committees and working groups.

23 How much of your organisation's yearly budget is invested to participate in standardisation activities?

Please provide an estimate in monetary terms (preferably in EUR).

In 2024, ECOS allocated €2,125,536 EUR to support its participation in standardisation activities, of which €1,519,473 EUR comes from the operating grant under the Regulation R1025 . For more information, ECOS article 24 provides details to the ECOS funding used to finance Standardisation activities according the Article 16 of the Regulation R1025

24 How much of your time per year in full-time equivalent (FTE) do you spend on standardisation activities?

16 equivalent FTE staff are participating to Standardisation activities. In addition to its full time staff, ECOS subcontracts external technical experts to ensure the specific expertise required for the standardisation topic is provided in standardisation technical committees and working groups.

25 In how many standardisation projects (e.g. working groups or technical committees) are you involved in simultaneously?

- 1
- 2-4
- 5-10
- 11+

26 What are the main reasons you or your organisation participate in standardisation work?

Societal interests are under-represented in European standardisation activities, ECOS has a permanent role within the European Standardisation System which is essential for Union objectives and policies and participates to the standardisation work to ensure public policy objectives (environmental protection) are properly represented and integrated during the development of standards. We bring the environmental technical expertise which is often overlooked in favour of short-term economic interests.

As standards no longer deal with only technical or market aspects, but can have an impact on people, workers and the environment, being used by the European Union to implement its public policy objectives with voluntary market tools, an inclusive and multi-stakeholder approach brings an important expertise, and checks and balances to standards-making. In this context, environmental stakeholders have a crucial role to play in the shaping and realisation of standards for greening the European economy; ECOS facilitates their representation in the European standardisation process linked to several industrial ecosystems and empowers and encourages its national members to actively participate in the standardisation process at national level in EU Member States.

Through our participation in standardisation work we strive to strike a fair balance between the mere private economic interests and the public interests that harmonised European standards underpin. We ensure the content of the standards remains aligned with Standardisation requests and the EU policy objectives they are mandated to serve supporting consistency and EU policy alignment.

27 Do you or your organisation receive EU funding to participate in standardisation activities?

- Yes
- No
- Don't know

28 Does your organisation want to play a more active role in the European standardisation system?

- Yes, my organisation thinks that it can benefit from participating more actively in European standardisation.
- No, my organisation does not think this is necessary.
- Don't know

29 What potential benefits does your organisation expect from more active participation in standardisation?

Standards is an important instrument supporting environmental and product legislations and today their role is more important than ever as they will need to support Europe's decarbonization and competitiveness objectives and drive Europe's green transition. By a more active participation, ECOS expects the following benefits:

- Sustainable competitiveness: Placing environmental protection at the heart of the Single Market will strengthen the EU's resilience and reduce future dependencies on external resources and third countries, securing that environmental protection is not forgotten during the development of standards, but a driving force.
- Strengthening the role and the input of societal stakeholders in the development of standards, bringing market relevance, balance, legitimacy and real-life insight into the standardisation process. ESOs uphold EU values of inclusiveness to reinforce the governance of the Single Market facilitating societal interests' representation
- Developing standards that not only serve markets, but also EU policy objectives and legislative requirements. ECOS provides the technical environmental expertise to EU priority areas within standardisation organisations to support implementation of EU legislation using market-based tools. This improves the implementation of the interplay between EU regulation and standardisation.
- Bringing more independent environmental experts around the table with an environmental perspective that would otherwise not be available to standardisation organisations and their members, making the standards fit for purpose.
- Promoting democratic checks and balances and upholding EU values in the standardisation system.
- Reinforcing participation of environmental stakeholders in standards-making contributing to the EU's environmental, climate, and circular economy goals through standardisation.
- Recognising civil society organisations as key stakeholders in standardisation, as is the need to reinforce inclusiveness at the European, national and international levels.
- Ensuring environmentally ambitious standards serve the internationalisation of the European standards (ENs) as envisioned by the EU Strategy on Standardisation.
- Identifying EU standardisation priorities necessary for the decarbonisation objectives and the green transition.

30 Do you consider investment in standardisation (via direct participation and/or financial support) by the following actors to be sufficient?

	More than Sufficient	Sufficient	Insufficient	Don't know
Member States			X	
European Commission			X	
Industry		X		
Academia & research & technology organisations (RTOs)				X
Civil society			X	

31 In your opinion, in which of these areas has the Standardisation Regulation been effective in its contributions?

You can select multiple choices

- Supporting a fast delivery of harmonised standards.
- Supporting a fast delivery of European standards.
- Supporting a fast delivery of other standardisation deliverables
- Guaranteeing that standards are easily available and accessible.
- Ensuring a balanced stakeholder participation in the development of European standards.
- Supporting the EU's role as a global standard-setter.
- Contributing to the international competitiveness of EU businesses.

Other

- However we would like to highlight that despite the improvements in terms of inclusiveness in recent years, thanks to the implementation of the provisions in regulation 1025, decision-making processes and operations within the ESOs still do not fully solve the issue of underrepresentation of key stakeholders at all levels. Access alone does not guarantee that public interest is considered. Having "access" is not the same as ensuring "effective participation"

32 Please specify

The regulation clarifies the rules of cooperation among the various actors within the system, including the ESOs, Member States (MS), the EC and the European stakeholders organisation. It defines the decision-making process for developing harmonized standards, emphasizing that the EU system should operate according to the principle of national delegation. Additionally, it standardizes the process of linking standards with legislation.

Most importantly, the regulation formally acknowledges the need to balance private and public interests. It does so by legally recognizing the specific role of European stakeholder organizations and establishing funding mechanisms to support their meaningful participation, thereby ensuring their effective contribution to the overall standardisation process.

E Speed and responsiveness to innovation

The results of the evaluation of the Standardisation Regulation highlight slow, complex processes, delays due to lengthy quality assessments, limited digitisation, and insufficient flexibility in finding alternatives when (harmonised) standards are not available in a timely manner.

The Commission aims to make the standardisation process faster and more flexible. In this section, we invite you to share your experience with the speed of delivering harmonised standards and suggest the most effective ways to improve it.

33 Have you experienced situations where harmonised standards were unavailable or delayed in their availability?

- Yes
- No
- Don't know

34 Have you encountered situations where other European standards or standardisation deliverables were unavailable or delayed?

- Yes
- No
- Don't know

35 How often have you experienced the unavailability or delayed availability of harmonised standards? How did your organisation adapt to these challenges? Please share specific examples, including in terms of quantifiable financial costs on your organisation.

ECOS has experienced delays in the delivery of hENs despite the existence of a SR (while we do not hold the specific data, the EC services mandating the standards as well as the ESOs accepting the SRs should be able to show the pertinent information). As Annex III and a key actor of the European standardisation system, we understand the importance of delivering standards ahead of the entry into force of any legal requirement to ensure the market can rely on the necessary tools to comply with legislation. It is part of our work to consistently emphasize in technical committees and Working groups the need to make progress and meet the deadlines set by standardisation requests and inform regularly the European commission whenever unnecessary delays are observed.

Based on our experience, the delays often come from:

- Ambiguous standardisation requests: If Standardisation requests are not clear enough, this often leads to prolonged unnecessary discussions on terminology and scope.
- The lengthiness of ESOs' internal procedures, where administrative steps often outlast the negotiations themselves.
- Experts involved in the drafting process not being sufficiently familiar with the standardization procedures or the particular specificities of hENs.

ECOS acknowledges the importance of the timely availability of harmonised standards necessary to support EU regulation. However, when standards are used to underpin legislation, we would like to highlight the risks of a time-focus and its possible implications on the consensus building process, and the overall quality of the standardisation deliverables need to be preserved. A few recommendations to improve the process are provided in the following document ([European standards: Inclusive, fit for purpose, and environmentally ambitious](#))

36 How often have you experienced the unavailability or delayed availability of other European standards or standardisation deliverables? How did your organisation adapt to these situations? Please share specific examples, including in terms of quantifiable financial costs on your organisation.

Delayed standards means prolonged discussions and this also means that we need more resources to ensure our experts can continue participating to the discussions. We need ESOs to ensure the Technical committees make steady progress and work collaboratively with all actors around the table from the outset and this during the entire timeframe imposed by the European commission.

As ECOS, we always need to apply for funding in advance to ensure we can finance the participation of our experts during the timeframe imposed by the EC. If the TC does not respect the agreed schedule, ECOS won't be able to participate to the future negotiations, with the risk that other stakeholders could exploit our absence to jeopardise all previous agreements.

37. Please share your views on the following approaches to improve speed and flexibility of standardisation processes.

	Level of agreement	Expected benefits for me /my organisation	Expected costs for me /my organisation
There should be stronger mechanisms, such as mandatory deadlines paired with penalties, to enforce timely delivery of requested (harmonised) standards.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
There should be more flexibility in the way (harmonised) standards are developed and delivered, including dedicated and simplified formats and procedures for (harmonised) standards requested to support EU law; use of alternative types of standardisation deliverables instead of standards; recourse to other standardisation bodies; open calls procedures for obtaining standards.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know

There should be fast-track procedures to develop and deliver priority standards.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
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The Commission's procedures for the request, evaluation and citation of (harmonised) standards should be simplified.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
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When standards or other standardisation deliverables are requested by the Commission, there should be strict, transparent and enforceable deadlines to be followed.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
Simplified procedures and consolidation of texts by default should be applied when existing standards are amended.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know

The procedures for drafting or editing a standard should be fully digitised. For example, information exchange during the drafting process should only take place in a digital format.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
There should be more and earlier involvement from Commission experts throughout the standardisation process to ensure that draft standards meet all legal requirements.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know

There should be better use of existing standards developed outside the European Standardisation System, provided they are appropriately adapted to meet essential requirements and subject to a set of criteria (e.g. inclusiveness, transparency).	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
When using standards from recognised international standardisation bodies such as ISO, IEC and ITU, there should be a faster adaptation, adoption and take-up in the EU system.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
The Commission should have the option to request the development of new standards by actors beyond the existing European Standardisation Organisations, provided that they work in an inclusive manner with balanced participation of relevant European stakeholders.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
All (harmonised) standards should follow the same strict template and format to improve readability (including machine-readability) and understanding of its main components.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know

38. What measures could be implemented when there are no harmonised standards or when such standards are delayed or unavailable at the time of applicability of the legislation they are supporting? For example: common specifications, interim solutions, use of previous standards.

To avoid legal uncertainty and ensure harmonised standards are available before the regulations come into play, we need ESOs to take responsibility making sure the standardizers make progress and deliver on time. However, for the Commission to decide on alternative routes to be used as back up options is also a responsible decision. Alternatives such as Common specification or the development of transitional methods could be acceptable alternatives, however, those should only be considered if the drafting and the decision making models ensure balanced consideration of all stakeholders views (inclusiveness).

39. What measures could be implemented when there are no other European standards or when such standards are delayed or unavailable at the time of applicability of the legislation they are supporting? For example: use of implementing acts, interim solutions, use of previous standards.

Alternative routes should only be considered as a fallback option, and only if the process is sufficiently inclusive to ensure a balanced and representative participation of all relevant stakeholders.

40 Please share your views on the following approaches related to the role of the European Standardisation Organisation (ESOs).

	Agreement	Expected benefits for me /my organisation	Expected costs for me /my organisation
The list of European Standardisation Organisations in Annex I of the Regulation should be reviewed regularly to verify if the ESOs still fulfil the conditions to have this status, and/or to add new ESOs.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
There should be a set of clear criteria that standardisation organisations must meet to be recognised as an ESO.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
The standardisation framework should be opened to allow other organisations or consortia to respond to specific standardisation requests alongside the recognised ESOs, provided they meet a set of pre-defined criteria, such as inclusiveness, ensuring the quality of their work.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know

41 What other measures do you propose to improve speed and responsiveness to innovation of the development of European standards?

As hENs support EU law, we would like to reiterate the importance of preserving the consensus building process with all stakeholders around the table, in particular societal stakeholders and SMEs, and adequate national consultations to ensure quality of the standardisation deliverables.

It is also essential that the entire hEN process is fully overseen, managed, and closely monitored by the EC.

1. In terms of Speed:

Actions need to be taken at each stage of the standardisation process, including:

The annual union working plan (AUWP)/Standardisation request stage.

- The AUWP should be used strategically and effectively by all the EC services to ensure that all standardisation needs are identified and requested in due time.
- 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.
- ESOs and Annex III are involved in structured exchanges with the EC as early as possible
- Deadlines of standardisation deliverables should be fixed according to the regulatory needs and need to be respected once approved.
- 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.

The standardisation development stage: 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:

- Maintaining the role of ESOs and Annex III organisations in reviewing the draft SR before it is submitted for approval by the Member States.
- Maintaining the standard drafting stage and consensus building with all stakeholders around the table.
- The enquiry stage: the handling of comments needs to be preserved and NSBs/NCs need to ensure enough national consultation periods.

The citation in the OJEU stage: the EC needs to move fast once the assessment of the candidate hEN is positive.

We would also recommend checking with Annex III organisations whether our voice has been properly considered during the standards development stage.

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.

Fast track procedures or new emerging standardisation deliverables, restricting participation for the sake of speed and responsiveness to innovation, risks jeopardizing quality but most importantly creating a market which would only be advantageous to specific industry actors to the expense of small businesses and public policy needs.

F Inclusiveness of the standardisation process

Regarding achieving a balanced stakeholder participation in standardisation work, several barriers remain, in particular the lack of financial support and incentives for EU SMEs, startups, civil society and academia.

Some organisations may lack the awareness, skills and resources to participate effectively, and are therefore underrepresented in the standardisation process. This is particularly acute in complex technical domains where working with standards requires scarce specialist knowledge.

In this section, we ask you to assess which measures you deem most relevant to improve an inclusive stakeholders' participation.

42 To what extent do you agree that standardisation activities are conducted in an inclusive manner, with balanced participation of all relevant stakeholders?

	Response
At national level, managed by national standardisation bodies.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know
At European level, managed by European standardisation organisations:	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know
At international level, managed by international standardisation bodies:	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know

43 How familiar are you with current or planned standardisation projects concerning European standards or other European standardisation deliverables that affect your organisation?

(e.g. the launch of a new working group)

- Fully aware
- Partly aware
- Neutral
- Partly unaware
- Fully unaware
- Don't know

44 Please share your views on the following potential measures to improve inclusiveness and stakeholder participation.

Proposed measure	Level of agreement	Expected benefit for me /my organisation
Measures such as financial support or free access are needed to better support participation of experts representing SMEs in technical committees.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
Measures such as financial support or free access are needed to better support participation of experts representing civil society in technical committees.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
Increased capacity building available for European experts interested in participating in standardisation activities. This could include training courses on how to participate in standardisation work or awareness building on financing opportunities.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
Increased transparency regarding the stakeholders involved in technical committees and working groups developing (harmonised) standards.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
<p>An obligation on ESOs and NSBs to ensure a minimum share of specific stakeholder interest in standardisation bodies and technical committees co-financed by the EU.</p> <p>For example, this could include a minimum share of SME representatives and balanced voting rights.</p>	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know

Voting rights for SMEs, consumers and other societal stakeholders (Annex III) in the standardisation process.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
<p>Accessible, simplified guidance to SMEs and other stakeholders to help new entrants find, understand and engage with standards.</p> <p>This could include tools like an AI-based standardisation assistant or a dedicated FAQ page.</p>	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know

45 What additional measures would you propose to improve inclusiveness and ensure balanced participation in standardisation?

At European level, it is important to strengthen the role of Annex III organisations and reform the decision-making model ensuring the voice of underrepresented stakeholders is not overlooked. The ESOs framework should implement internal mechanisms that foster constructive collaboration between industry experts and other stakeholder groups. Moreover, given the limited representation of civil society actors and the outnumber of industry representatives, it is necessary to explore alternative mechanisms to traditional voting rights. In view of the systematic under-representation of societal stakeholders, measures such as granting veto rights or binding opinions should be considered to ensure their effective influence and balanced participation/

Moreover, in the context of the ongoing reflections around extending the scope of Annex I, it is important that the regulation provides clear guidance of the following :

- The responsibility of ESOs to ensure their internal processes account for participation of the European stakeholders organisations (Annex III) and also ensuring an efficient and collaborative exchange between industry and societal stakeholders.
- Free access conditions for Annex III organisations. Any Standardisation Development Organisation (SDO) intending to develop harmonised European standards (hENs) must guarantee free and effective access for all Annex III organisations. This should be a non-negotiable requirement to be able to develop an hEN.
- The regulation should reaffirm that consensus must reflect both private and public policy interests, with public policy interests being represented by Annex III organisations. Their contributions must be genuinely considered in the consensus-building process.
- Uniform decision making models across all SDOs: A consistent decision making model must be applied by all SDOs involved in the development of hENs, ensuring that the voice of Annex III is duly integrated.
- We call for continued EU and EFTA support for the present Annex III organisations and their explicit recognition as designated beneficiaries in the next MFF.

Improving Inclusiveness at **International Level** must be reflected in the regulation. International standards play a critical role in removing global barriers to trade and could be key instruments for supporting EU's competitiveness ambitions. Therefore, it is important to welcome the adoption of international standards, however, only if the same European inclusiveness conditions are respected. This includes guaranteeing that Annex III organisations have a seat at the table and are meaningfully involved in the process.

Agreements between private standardisation organisations cannot be considered sufficient justification for limiting participation or lowering inclusiveness requirements. If a Standardisation Development Organisation (SDO) chooses to subcontract another organisation to develop a hEN, it remains fully responsible for ensuring stakeholder participation and full compliance with the Standardisation Regulation, and European decision-making model, including the participation rights of Annex III stakeholders. The recommendations proposed by the High level forum WS5 should be considered to enhance the inclusiveness of the system.

Because the system relies on the national-delegation principle, it is also essential to address inclusiveness at the **national level**. The recommendations proposed by Workstream 3 of the High-Level Forum on European Standardisation provide the foundations to improve national inclusiveness and should be taken into account <https://ec.europa.eu/transparency/expert-groups-register/core/api/front/expertGroupAdditionalInfo/55234/download>

G Access to standards

Case law confirms that harmonised standards are part of EU law, and that the principles of transparency and accessibility apply. Requirements in the current framework to encourage and facilitate access to standards have proven insufficient. Ensuring accessibility – especially for citizens, public authorities and SMEs – is therefore a matter of legal compliance and fair competition.

In this section, we ask you to share your views on how to improve access to harmonised standards.

46 To what extent do you agree with the following statements concerning your experience with access to harmonised standards?

	Response
<p>It is difficult to identify the legally relevant content of a harmonised standard which is needed for presumption of conformity.</p> <p>Legally relevant content is the specific content from the standard that provides the technical details on how the legal requirements of EU legislation can be implemented.</p>	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know
<p>Harmonised standards are too long and complex.</p>	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know

It is easy to find which harmonised standard(s) best fit to my/my organisation's needs.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know
Harmonised standards sufficiently reflect the state of the art.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know
Having more options of standards to choose from would be beneficial.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know

47 Please share your views on the following statements related to potential measures to improve access to standards.

Potential measures	Level of agreement	Expected benefits for me /my organisation	Expected costs for me/my organisation
The legally relevant content of standards should be published and freely accessible by default.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
Free access to a simplified summary of a standard's content would be useful.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know

Accessing only the legally relevant content of harmonised standards in the OJEU is sufficient for my work.	<ul style="list-style-type: none"> • Strongly agree • Somewhat agree • Neutral • Somewhat disagree • Strongly disagree • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know
Access to standards supporting EU law in one's own language is important.	<ul style="list-style-type: none"> • Strongly agree • Somewhat agree • Neutral • Somewhat disagree • Strongly disagree • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know

H EU's role in global standard-setting

While the EU has traditionally had a strong footprint in international standardisation activities, other countries and regions have become increasingly assertive and are using standards to give their industries a competitive advantage. In this section, we want you to share which measures you deem most relevant to strengthen the EU's role in global standard-setting.

48 To what extent do you agree that, in your field of expertise, the EU has a strong influence on standardisation internationally?

- Strongly agree
- Somewhat agree
- Neutral
- Somewhat disagree
- Strongly disagree
- Don't know

49 Please indicate your thoughts on the following potential measures to strengthening the EU's role in international and global standard-setting.

Potential measure	Level of agreement	Expected benefits for me /my organisation	Expected costs for me /my organisation
Measures such as financial support and capacity building are needed to improve participation of experts representing SMEs or civil society from the EU in technical committees at the international level.	<ul style="list-style-type: none"> • Strongly agree • Somewhat agree • Neutral • Somewhat disagree • Strongly disagree • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know
The EU should introduce a systematic monitoring action on new and on-going international standardisation activities and an intervention system to better protect EU values in international standardisation when needed.	<ul style="list-style-type: none"> • Strongly agree • Somewhat agree • Neutral • Somewhat disagree • Strongly disagree • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know
The EU should prioritise financial support and other types of incentives to European stakeholders active in developing standards in emerging technologies.	<ul style="list-style-type: none"> • Strongly agree • Somewhat agree • Neutral • Somewhat disagree • Strongly disagree • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know
There should be measures to increase cooperation and coordination between European stakeholders in international standards organisations.	<ul style="list-style-type: none"> • Strongly agree • Somewhat agree • Neutral • Somewhat disagree • Strongly disagree • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know 	<ul style="list-style-type: none"> • Very high • High • Moderate • Low • Very low • Don't know

The EU should build structural alliances with like-minded partners at the international level to amplify its values and strategic goals.	<ul style="list-style-type: none"> Strongly agree Somewhat agree Neutral Somewhat disagree Strongly disagree Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know 	<ul style="list-style-type: none"> Very high High Moderate Low Very low Don't know
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50 What aspects should be evaluated when considering the legislative use of international standards at EU level? (several options)

- None, international standards should be taken up in support of EU legislation whenever possible
- Alignment with EU values, notably its Charter of Fundamental Rights
- Impact on international competitiveness of EU companies
- Compatibility with EU policy objectives, including strategic autonomy, health, safety and performance requirements, green and digital transition
- Inclusiveness of the development process of the international standard
- Reflecting the recognised technological and legal state of the art in the EU
- Other

51 Please specify

52 What other measures do you propose to strengthen the EU's influence in international and global standardisation?

Coordinated EU participation in international standardisation is essential to promoting and defending Europe's strategic interests, in particular those reflecting EU's environmental commitments and ambition. This is critical to ensuring that European priorities, regulatory ambitions and values, such as inclusiveness, are reflected in the global standardisation agenda. The high-level forum on Standardisation should serve as a platform for exchanging ideas and coordinating actions on strategic topics.

A way to strengthen the EU's influence in international standardisation comes also through strengthening the participation of EU societal stakeholders therein. To date, participation rules for societal stakeholders in international processes is not guaranteed, nor do we have the same rights and conditions for participation. This hinders the potential for EU societal stakeholders to adequately contribute to international standards making and must be tackled.

53 Do you think the Commission or another EU entity should be more or less involved in the following activities when carried out at international level?

	Response
Prioritisation of key standardisation projects	<ul style="list-style-type: none"> More Less No Change Don't know

Support for pre-normative research	<ul style="list-style-type: none"> • More • Less • No change • Don't know
Assessment of proposed harmonised standards	<ul style="list-style-type: none"> • More • Less • No change • Don't know
Coordination of EU participation in international standardisation	<ul style="list-style-type: none"> • More • Less • No change • Don't know
Collaboration with international partners on standardisation	<ul style="list-style-type: none"> • More • Less • No change • Don't know
Promotion of skills and education in standardisation	<ul style="list-style-type: none"> • More • Less • No change • Don't know
Active and direct participation in standardisation activities	<ul style="list-style-type: none"> • More • Less • No change • Don't know

I Final Remarks

54 You have reached the end of this questionnaire. If, in your opinion, specific points have not been sufficiently covered or were even left out, please provide any further comments or additional information here:

- Additional paper

55 Would you be interested in participating in a targeted consultation?

- Yes
- No

57 You may upload any additional documents (e.g. position papers) to support your contribution to this consultation.

Please note that any uploaded material will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

- Only files of the type pdf, txt, doc, docx, odt, rtf are allowed