

Discussion Paper

CEN and CENELEC Response to the European Commission consultation on the Revision of Directive 2014/24/EU on Public Procurement

CEN and CENELEC welcome and support the European Commission's initiative to revise Directive 2014/24/EU on public procurement with the objective of increasing simplicity, flexibility, and transparency. A more effective public procurement framework has the potential to improve the efficiency of public investments, strengthen the EU's economic security, and better align procurement practices with the Union's strategic priorities. Such improvements would facilitate access to cross-border procurement opportunities in the Single Market, thereby enabling European businesses to expand their customer base and enhance their competitiveness.

European Standards play a central role in enabling trade, interoperability, and fair competition within the Single Market. For this reason, CEN and CENELEC consider it essential that the revision of the Public Procurement Directive be closely coordinated with the ongoing revision of the Standardization Regulation. A coherent and aligned approach between these two legislative frameworks is necessary to ensure legal certainty, avoid inconsistencies, and maximise the benefits for economic operators and public authorities alike.

It is also essential to coordinate this revision with the revision of Defence Procurement. Standardization should be kept as a key tool for public procurement, in the same way that it is currently in the Defence Procurement Directive. There is a lot of evidence of the impact of standards and standardization in this sector¹.

Recent economic studies done by the OECD found that standardization contributes to between 0,5 % and 1,5% of GDP. As an example, in the Nordics standards contribute to 39% of labor productivity growth and 28% of GDP growth². A recent publication by OECD gives recommendations on the use of standards to reinforce regulatory frameworks³.

¹ <https://www.dsp.dla.mil/Publications/Case-Studies/>

² <https://www.sis.se/en/standards/the-influence-of-standards-on-the-nordic-economies/>

In revising the Public Procurement Directive, it is essential to preserve and further reinforce the value of the European Standardization System (ESS). The Directive should continue to prioritise the use of standardisation deliverables developed by the recognised European Standardization Organisations (ESOs), their national members, and their international counterparts, as defined in Regulation (EU) No 1025/2012 on European standardisation. This prioritisation is particularly important to ensure consistency, predictability, and equal treatment across procurement procedures in all Member States.

CEN and CENELEC, as two of the officially recognised ESOs, apply the “one standard” principle, under which their National Standardization Bodies and National Committees are required to withdraw conflicting national standards once a European Standard is adopted. This principle is fundamental to ensuring uniformity, interoperability, and the effective functioning of the Single Market, while preventing fragmentation and unnecessary complexity for contracting authorities and economic operators. It also provides a clear and reliable reference framework for public procurers, reducing administrative burden and legal uncertainty.

Through the Vienna Agreement between CEN and ISO and the Frankfurt Agreement between CENELEC and IEC, this approach is extended to the international level, with a clear preference for the development of a single globally relevant standard wherever possible. This contributes to global coherence, facilitates international trade, and reinforces Europe’s influence in international standardisation. Such international alignment further strengthens the relevance of European Standards when referenced in public procurement, including in a global supply chain context.

These considerations should be duly taken into account when dealing with Article 13 of EU Regulation 1025/2012 that allows under specific conditions, for the use in public procurement of ICT technical specifications developed by organisations outside the ESOs. While CEN and CENELEC acknowledge the need for a certain degree of flexibility in the fast-evolving ICT sector, it is important that the application of this provision does not undermine the established strengths of the recognised ESOs, but rather remains complementary to their work. In particular, such flexibility should not lead to the systematic bypassing of European Standards or to the emergence of divergent technical requirements across Member States.

In this context, CEN and CENELEC are currently examining ways to strengthen cooperation with fora and consortia that develop their own technical specifications in order to make the standardisation processes more agile and in line with emerging technologies. Such cooperation can be beneficial where it supports innovation, promotes global alignment, and enables the timely availability of technical solutions, as long as this cooperation is balanced and is upholding the WTO principles on consensus, transparency and openness, which are at the core of CEN and CENELEC values. The consensus-based and transparent model that underpins CEN and CENELEC remains fundamental to the

³ https://www.oecd.org/en/publications/reinforcing-regulatory-frameworks-through-standards-measurements-and-assurance_f398be90-en.html

credibility, legitimacy, and international recognition of European standardization.

Building on this approach, CEN and CENELEC are further opening their system to constructive cooperation, with the objective of acting as a “European standardization hub”. This role would allow for the integration of high-quality standards content developed in line with European interests, values, and regulatory principles, while fully preserving the integrity and coherence of the ESS.

CEN and CENELEC recognise the need to manage cooperation with SDOs with strategic vigilance. While targeted alliances in specific sectors may be appropriate to ensure global alignment, avoid duplication of work, and maintain Europe’s influence in international standardization, such cooperation should take place within a predefined and clear harmonised European framework. The proliferation of ad hoc or bilateral arrangements outside the ESS risks leading to fragmentation, inconsistencies, and a weakening of Europe’s coherent and authoritative voice at global level.

SDOs should therefore be encouraged to channel relevant standardisation deliverables through the European Standardization System. This approach would stimulate innovation and allow that global expertise complements and strengthens Europe’s standardisation capacity, rather than substituting it. It is fully consistent with the European Commission’s objective to “Choose Europe”, reinforces the European Quality Infrastructure underpinning the EU legislative framework, and contributes to safeguarding Europe’s sovereignty, resilience, and leadership in global standardization. In this perspective, European Standards should remain the primary and preferred reference for technical specifications in public procurement, supporting not only efficiency and transparency, but also the Union’s broader strategic objectives, including economic security, resilience, and strategic autonomy.

CEN and CENELEC further underline that public procurement is increasingly recognised as a strategic policy instrument within the Single Market. This is reflected in recent EU policy initiatives, including the Single Market Strategy, which emphasises the need to reduce strategic dependencies, strengthen industrial ecosystems, and ensure fair and effective competition across the Union. In this context, public procurement can play a key role in shaping market behaviour and supporting long-term European interests.

These orientations are also echoed in the report by Mario Draghi on the future of European competitiveness, which highlights the importance of reinforcing Europe’s technological, industrial and economic sovereignty, notably through better coordination between regulatory, industrial and standardisation policies. European Standards provide a concrete and operational means to translate these strategic objectives into market-relevant and legally robust procurement practices.

In addition, the European Commission’s Work Programme 2026 (“Europe’s Independent Moment”) explicitly underlines the growing importance of sovereignty, resilience and security of supply across a range of strategic sectors. Anticipating these policy developments through a consistent and coherent use of European Standards in public procurement will help ensure that future legislative and regulatory initiatives can be effectively supported by the European Standardization System.

In this context, sovereignty should be understood in an operational sense, as the ability for public authorities to retain autonomy of appreciation, decision and action when defining and implementing procurement requirements. Referencing European Standards in public procurement contributes to this objective by ensuring transparency of technical requirements, reducing vendor lock-in, supporting interoperability, and preserving freedom of choice for contracting authorities over time.

CEN and CENELEC therefore consider that the revised Public Procurement Directive should explicitly recognise the contribution of European Standards to the Union's sovereignty, resilience and competitiveness objectives, as articulated in the Single Market Strategy, the report on European competitiveness, and the Commission's future work programme, while fully preserving the principles of openness, competition and proportionality that underpin the Single Market. Such an approach would allow public procurement to support strategic European interests in a balanced, predictable and legally robust manner, fully aligned with EU internal market rules and international commitments.

About CEN and CENELEC

CEN (European Committee for Standardization) and CENELEC (European Committee for Electrotechnical Standardization) are recognized by the European Union (EU) and the European Free Trade Association (EFTA) as European Standardization Organizations responsible for developing standards at European level, as per European Regulation 1025/2012. The members are the National Standards Bodies (CEN) and National Electrotechnical Committees (CENELEC) from 34 European countries. European Standards (ENs) and other standardization deliverables are adopted by CEN and CENELEC, are accepted and recognized in all of these countries. These standards contribute to enhancing safety, improving quality, facilitating cross-border trade and strengthening of the European Single Market. They are developed through a process of collaboration among experts nominated by business and industry, research institutions, consumer and environmental organizations, trade unions and other societal stakeholders. CEN and CENELEC work to promote the international alignment of standards in the framework of technical cooperation agreements with ISO (International Organization for Standardization) and the IEC (International Electrotechnical Commission).