

POSITION PAPER
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Revision Regulation 1025/2012



Revision EU Regulation

NO. 1025/2012

Introduction

CEN and CENELEC are committed to contributing constructively and proactively to the ongoing revision of Regulation (EU) No 1025/2012. This process offers a unique opportunity to modernize the European Standardization System (ESS), strengthen its coherence, and ensure it continues to advance Europe's competitiveness, innovation, and societal goals.

The European Standardization has consistently demonstrated its value as a trusted and efficient mechanism underpinning the Single Market and Europe's regulatory framework. CEN and CENELEC believe that any revision should preserve the founding principles of the system, while adapting to a rapidly evolving environment marked by digital transformation, emerging technologies, and global competition. In doing so, it is essential that the ESS continues to uphold the WTO principles of transparency, openness, impartiality, consensus, effectiveness, relevance, and coherence that serve as the global mandate for open, fair, and trusted standardization.

“The Standardization Regulation serves as a good example of a functioning Public Private Partnership (PPP). It streamlines the approach how regulations and standards go hand in hand and harmonises this approach across several directives and regulations enabling broader and faster market access and significantly reducing inherent costs.”

CEN and CENELEC Industry Advisory Forum [1]

[1] The CEN and CENELEC Industry Advisory Forum acts in an advisory capacity reporting to the CEN and CENELEC Presidential Committee. The group is composed of European industry representatives to provide a perspective on a variety of relevant topics for standardization.

Speed and responsiveness to innovation

a) Timeliness

CEN and CENELEC are reflecting on how to make the European Standardization System more flexible and responsive to the evolving needs of the market and policymakers. We are committed to enhancing flexibility and speed without compromising inclusiveness or excellence, ensuring that standardization remains a driver of innovation and a fast track to market uptake.

Building on our existing framework, we are developing new types of deliverables such as European Agile Specifications (EAS), which can provide agile, consensus-based technical references within the formal ESO framework, particularly valuable in emerging areas where full European Standards (ENs) may take longer to develop.

In cases where no harmonized standard is yet available, selected ESO deliverables could provide presumption of conformity with essential regulatory requirements. This approach would strengthen legal certainty for economic operators, accelerate innovation, and ensure that conformity assessment continues to rely on trusted, consensus-based documents developed within the European standardization system. We believe that using such deliverables, developed and adopted under ESO procedures, guarantees openness, transparency, and full stakeholder participation, leading to market acceptance. This should be recognized within the European legal framework.

CEN and CENELEC are also investing into new technologies to future proof the ESS. Two key projects are Machine-Readable Standards (SMART) and Online Standards Development (OSD). OSD, integrated with SMART template, provides the opportunity for the Technical Committees to use a collaborative authoring online solution, which can enable faster progress on documents, by allowing a continuous development of standards and reducing the time spent for providing and resolving comments, while enabling wide participation and inclusiveness. SMART standards will allow us to offer a more innovative deliverable to standard users.

b) Flexibility

Standards developed by actors beyond the existing ESOs

CEN and CENELEC are open to strengthening partnerships with fora and consortia developing their own specifications (SDOs) and are looking into possible avenues for

collaboration but always within a clear, transparent, and rules-based framework. The inclusive, consensus-based, and transparent model that underpins CEN and CENELEC remains essential to the credibility and success of European standardization. To uphold this, CEN and CENELEC are further opening their system to constructive cooperation, positioning themselves as a true “European standardization hub”, that is a central integrator of high-quality standards content developed in line with European interests, values, and regulatory principles.

CEN and CENELEC recognize the need to manage cooperation with SDOs. However, this should be done with strategic vigilance. While alliances in specific sectors will continue to be explored to ensure global alignment, avoid duplication, and maintain Europe’s influence in international standardization, such cooperation must take place within a harmonized, transparent, and rules-based European framework. Preventing the proliferation of ad hoc or bilateral arrangements is essential to avoid fragmentation, inconsistencies, and the weakening of Europe’s coherent voice on the global stage.

External SDOs should therefore be encouraged to channel their standards through the European Standardization System, ensuring that global expertise strengthens, rather than substitutes, Europe’s capacity to act. This approach supports the European Commission’s call to “Choose Europe”, reinforces the European Quality Infrastructure which underpins the European legislative framework, and safeguards Europe’s sovereignty and leadership in global standardization.

The portfolios of CEN and CENELEC are made up of 26.872 standards and other deliverables, of which approximately 3.000 are drafted in support of legislation (harmonized standards). On average, CEN and CENELEC produce more than 1.400 standard per year.

Penalties to enforce delivery of standards

We disagree with the proposal from the Public Consultation on penalties being linked to mandatory deadlines to enforce the timely delivery of standards (question 37). To improve the timely delivery of standards, it is critical that CEN, CENELEC and the European Commission drive towards a strong partnership model, fostering collaboration among all stakeholders for achievable outcomes, and avoid drifting towards a “supply relationship”. Instead of imposing penalties, which risk alienating volunteer experts and diminishing participation, the system should explore mechanisms for incentives and recognition.

CEN and CENELEC Industry Advisory Forum, note that the Commission's current prescriptive approach has resulted in stringent timelines and detailed work programmes that put undue pressure on experts, limiting their ability to develop high-quality standards. Such a proposal would exert even more pressure on the experts who volunteer to contribute to the development of hENs.

Inclusiveness of the standardization process

The involvement of SMEs and societal stakeholders is critical for a strong and unique European Standardization System that can develop high quality standards that are: market-based and market-relevant, rooted in European values and meet European legislative needs.

The role of the National Delegation Principle

European standardization thrives on inclusiveness; this is delivered through the national delegation principle. Under this model, each country speaks with one voice at European level through its National Standardization Body (NSB) and National Committee (NC). These bodies gather input from their national stakeholders – industry (including SMEs), consumer groups, trade unions, academia, research, civil society, and public authorities – into a balanced national position, ensuring that European standards are both technically sound and socially legitimate. Under this model, **NSBs/NCs are perfectly positioned to offer to national stakeholders tailored support and services, in their national language.**

The role of Annex III at European Level

Inclusiveness via the national delegation principles is reinforced at European level by the Annex III organizations, ANEC, ECOS, ETUC and SBS. **Regulation 1025/2012 has greatly improved the inclusiveness of the European Standardization System**, due to the contributions of these organizations. The revised regulation should build on the existing foundation and ensure that SMEs and societal stakeholders continue playing a key role in shaping standards.

In CEN and CENELEC, Annex III Organizations contribute at both governance and technical levels. Below is an overview of their participation in CEN and CENELEC technical bodies for 2024.



- ECOS actively contributed to the development of EN 17988, the European standard for the circular design of fishing gear and aquaculture equipment. This work ensured that the standard integrates key environmental principles, such as the EU waste hierarchy and resource efficiency, while aligning terminology with EU legislation, including the ESPR.
- ANEC was actively involved in developing EN 17999, 'Accessible systems for living independently: Requirements and recommendations'. This standard underscores the importance of accessibility-by-design and usability in enabling persons with disabilities and older consumers to live independently. ANEC endorsed the final text, and following unanimous approval, the standard was officially published on 6 February 2025.
- Following a proposal from ETUC to CEN and ISO, the standard EN ISO 374-6:2025 on protective gloves for hairdressers was developed. ETUC played a key role throughout the drafting process, and the final standard provides a concrete example of how standardization can significantly enhance occupational health and safety. It also demonstrates the critical importance of involving trade unions in standardization.
- During the development of EN 13697, which covers a test method to assess the activity of chemical disinfectants and antiseptics, SBS had a key role ensuring that this standard is applicable by SMEs, to further adapting it to their needs. The SBS SME Compatibility Test was used to more accurately identify and correct shortcomings in the standard.

Financial Support to boost participation of SMEs and Civil Society

Regarding the question from the Public Consultation on the need for measures such as financial support or free access to better support participation of experts representing SMEs and Civil Society in technical committees, we had a neutral stance. Our neutral position reflects the diversity of realities across National Standardization Bodies (NSBs) and National Committees (NCs). Each operates under its own business model and funding structure, making a one-size-fits-all solution impractical.

While financial support or free access may help in some cases, these measures do not address the main barriers to SME and civil society participation: lack of resources, time, and technical expertise. Membership fees are rarely the decisive factor. In fact, in many countries SMEs are already the primary stakeholders, thus removing fees would raise the question of who covers the cost, potentially destabilizing the system.

As noted above, many NSBs and NCs already provide capacity-building and outreach programs to support SMEs and societal stakeholders. These tailored approaches are more effective than blanket measures.

Voting rights for SMEs, consumers and other societal stakeholders

Regarding the question from the Public Consultation on granting voting rights to SMEs, consumers and other societal stakeholders, our position is to strongly disagree. While we very much value the input of our SME and societal stakeholders, as outlined above, granting additional voting rights would undermine the national delegation principle, which consolidates stakeholder input into a single national position. This system ensures legitimacy and efficiency; fragmenting it would risk disintegration and conflicting positions between national and European levels.

Moreover, influence is not solely determined by voting rights—opinions and technical arguments can often carry more weight than a formal vote (e.g., Commission interventions prompting reconsideration of content). Giving SMEs or Annex III organizations extra voting rights would distort the consensus-based approach rather than strengthen it.

Access to standards

Generally speaking, CEN and CENELEC **agree to grant access free of charge to the elements of harmonised standards which provide presumption of conformity**. At the same time this impacts the foundations of our business model. It therefore requires a balanced approach, underpinned by dialogue, gradual implementation (transitional phase),

and safeguards to preserve the sustainability and high quality of the consensus-based European Standardization System.

The preservation of intellectual property rights within standards remains a cornerstone of the European standardization model. Far from being an obstacle to transparency, copyright is a prerequisite for it as it ensures quality, traceability, and long-term sustainability. It protects the intellectual contributions of experts and industry, underpins investment in technical excellence and ensures that European standards remain globally recognized, harmonised and implementable.

Upholding these rights is also vital to the financial sustainability and independence of the European standardization system. Copyright allows National Standardization Bodies (NSBs) and National Committees (NCs), many of which operate on a not-for-profit basis, to reinvest in the continuous development of standards and value-added services that facilitate their implementation, while maintaining the overall integrity and credibility of the system.

Europe's role in global standard-setting

Strengthening international influence through ISO and IEC participation

CEN and CENELEC fully recognize the importance of reinforcing cooperation and partnerships with global partners such as ISO and IEC. Strategic partnerships under the Vienna Agreement (CEN-ISO) and the Frankfurt Agreement (CENELEC-IEC) ensure that standards are developed in line with European values, interests, and regulatory principles, while supporting EU legislation and policies. These frameworks also enable European industry to design and supply goods and services that meet European Standards for the internal market and European-aligned International Standards for global markets, thereby enhancing Europe's industrial competitiveness and leadership.

Through the Vienna and Frankfurt Agreements with ISO-CEN and IEC-CENELEC, Europe has the unique ability to give priority to cooperation with ISO and IEC provided that international standards meet European legislative and market requirements. Integrating global standards into the European system through the Vienna and Frankfurt agreements helps avoid duplication and fragmentation. This is evident in widely adopted standards such as the ISO/IEC 17000 series on Conformity Assessment. Importantly, the agreements also create efficiency and save resources for the stakeholders, as they can contribute their expertise and influence the outcomes through a single route.

CEN Members hold:	CENELEC Members hold:
409 secretariats of ISO TCs and SCs (52% of total)	117 secretariats of IEC TCs and SCs (59% of total)
377 chairs of ISO TCs and SCs (48% of total)	113 chairs of IEC TCs and SCs (57% of total)
47% of ISO P-Membership	56% of IEC P-Membership
48.5% of ISO O-Membership	58% of IEC O-Membership
6 out of 20 Members in ISO Council (30%)	6 out of 15 Members in IEC Board (40%)
7 out of 15 Members in ISO TMB (46.7%)	7 out of 15 Members in IEC SMB (46.7%)

- Technical Committees (TC) Sub-Committees (SC).
- Participating Members (P-Members) have voting rights in [ISO/IEC](#) Technical Committees.
- Observing-members (O-Members) are observers and are only able to provide comments and advice.
- ISO Technical Management Board (TMB) and IEC Standardization Management Board (SMB) are the Technical Boards of ISO and IEC.

- A new series of standards for lifts, escalators, and moving walks is under parallel development in ISO/TC 178 and CEN/TC 10, led by CEN and based on European work. The standards in this series aim to strengthen safety, electromagnetic compatibility, and cybersecurity, ensuring modern lifts meet both technical and digital resilience needs. By leading this work, Europe positions its industry at the forefront giving European lift manufacturers a competitive edge in international markets.
- To support the Ecodesign Directive, CEN-CLC/JTC 10 developed the EN 4555X series of standards, setting methods for assessing material efficiency in energy-related products. Building on this work, IEC/TC 111 requested CEN and CENELEC to take over the development of the key standards IEC 63683-2 for assessing repair, reuse, and upgrade potential and IEC 63333:2023 for measuring reused components in products. This demonstrates how European leadership in material efficiency is shaping global standards for product durability and circular economy.
- The Digital Product Passport CEN-CLC/JTC 24 was created in September 2023, following the adoption of the Ecodesign for Sustainable Products Regulation and related Standardization Request. A proposal made by the CEN and CENELEC Members DIN and DKE to create an ISO/IEC/JTC on DPP was recently approved by ISO members.

***How to reinforce the European voice at the International level?
Through a better prioritization of topics and sectors which are
crucial for European stakeholders!***

This can help European NSBs/NCs to coordinate and ensure presence in the international technical committees. For this purpose, the High-Level Forum - which gathers the Commission, Member states, ESOs, European industry and Annex 3 organizations - seems well positioned to identify key topics for Europe with a global relevance, so that to allow European industry to:

- mobilize experts in international standardization via the NSBs/NCs
- CEN and CENELEC Members to ensure presence/ lead international technical

"Since alignment of standards at international level is key to competitiveness of European industry on the international stage, we need to fully use the FA and the VA, based on the stakeholder needs."

**CEN and CENELEC
Industry Advisory Forum**

Conclusion: Europe's standardization system works — modernization should strengthen it, not replace it.

“The Standardization Regulation has successfully supported the development of harmonized standards within Europe, allowing broader and faster market access and significantly reducing inherent costs. The following founding principles should be preserved: Voluntary use of standards, Presumption of Conformity (PoC), PPP and Inclusiveness.”

CEN and CENELEC Industry Advisory Forum

In conclusion, while we acknowledge the need to evolve and adapt to meet the technological realities of today and tomorrow, it is essential to remember that European standards are developed **by Europeans, for Europeans, with the goal of achieving their international adoption.**

They are a cornerstone of our sovereignty and industrial leadership. Any evolution of the system must therefore be approached with care and discernment, preserving the principles at the heart of our model: openness, transparency, inclusiveness, and consensus.

By remaining true to these values, we can strengthen trust in European standards and ensure Europe's continued ability to shape its own future.

Annex 1: CEN and CENELEC Industry Advisory Forum Contribution

Industry Advisory Forum recommendations on Regulation (EU) 1025/2012

Recommendations on key messages

The Standardization Regulation serves as a good example of a functioning Public Private Partnership (PPP). It streamlines the approach how regulations and standards go hand in hand and harmonizes this approach across several directives and regulations enabling broader and faster market access and significantly reducing inherent costs^[1]. Harmonized standards enable the free movement of products within the European Economic Area (EEA) and continues to support a green, digital and resilient Single Market. They are and should always be developed while considering the market relevance, balance between cost of implementation and benefit for society?

The IAF recommends the following:

Preserve the founding principles and content of the Standardization Regulation
The Standardization Regulation has successfully supported the development of harmonized standards within Europe, allowing broader and faster market access and significantly reducing inherent costs. The following founding principles should be preserved.

- a. Voluntary use of standards
- b. Presumption of Conformity (PoC)
- c. PPP
- d. Inclusiveness

Recommendations on the implementation of the Regulation

The implementation of the Standardization Regulation can be simplified through several means:

2.1 Develop the way of funding for harmonized standards to secure expertise and accessibility.

Secure sufficient experts

To ensure inclusive and effective participation in standardization, especially by Small and Medium-Sized enterprises (SMEs) and researchers, the funding mechanisms for harmonized standards must be improved. This includes not only increasing financial support but also making funding more accessible, predictable, timely and aligned with innovation cycles. However, funding alone is not sufficient—an ecosystem, where expertise (skills), financial incentives (not limited to funding) and linkages between researchers and industry through programmes such as Erasmus is needed. This will allow all types of industries and researchers to integrate and contribute to standards. It will also eliminate or reduce freeriding activities, where funding is abused.

Universal fund to accommodate the court ruling on accessibility requirements

A universal fund to meet societal objectives were introduced in previous legislations such as the telecom regulatory framework of 2002. Such a fund would reduce the impact of the Malamud case and allow the Commission to comply with the court ruling, while upholding Intellectual Property Rights (IPR). Member states should be the primary source of funding the universal fund.

Europe's role in global standard-setting

During the second mandate of the IAF a position was published and annexed to CEN-CENELEC reply to the public consultation of 2024 on Regulation 1025. The position paper recommendation targeted Formal objection and Transition Period. The IAF considers these two recommendations valid for this paper (paper attached in annex 1) and adds the following:

Early industry involvement

In accordance with Recital 7 of the Standardization Regulation, the leading role of industry in standards creation and validation must be reinforced to ensure standards uptake and use. A constructive dialogue between the Commission and industry helps determine areas where harmonised standards are needed. For emerging topics, we recommend the Commission to invite external industry experts during the initiation phase.

Development process

Speeding up the process of developing harmonized standards, their assessment and citation in the OJEU by setting maximum deadlines for development of and agreeing on a SReq compared to the start of the creation of a regulation. The Commission's prescriptive approach has resulted in stringent timelines and detailed work programmes that put undue pressure on experts, limiting their ability to develop high-quality standards.

Assessment and citation

The most common type of blockage observed by the industry regarding the finalization process of harmonized standards and their citation is related to disputed interpretations of the SReq by the HAS consultant and the Experts in a Technical Committee (TC) in CEN/CENELEC. Furthermore, the lack of industry inclusion during the drafting process of SReq has unfortunately led to deviation between the content of SReqs and industry's practice.

In addition, a decision process (including a Decision ranking process) should be established to ensure that non-cited European standards could be a "just enough" solution in front of the relevant regulation target, that would mean a more efficient and fast process whenever needed.

To alleviate the finalization and citation of harmonized standards, we suggest the Commission implement the following improvements to secure an efficient and fast assessment process that leads to timely citation of harmonized standards in the OJEU:

- 1. Use Acquis-like process for drafting the SReq:** In 2021, the Commission initiated an Acquis process for Construction sector to improve – among other things – the planning of SReq. Based on the first SReq's being finalized this year, the industry has so far been satisfied with the process and standardization experts have stronger confidence in their abilities to meet the timelines expected for the development of hEN.
- 2. Early involvement of the HAS consultant:** The standardization process starts the minute the SReq is being drafted and HAS Consultants should therefore be involved in the discussions at this stage.
- 3. Introduce transitional solutions for compliance:** Allow for the use of non-cited published ENs or international standards, which represent the 'state-of-the-art' and meet the essential technical requirements of the respective regulation. These could be listed somewhere other than the official journal, primarily to assist SMEs.

4. Manage dated references without citation burden: Dated references of standards referred to in harmonized standards risk triggering unnecessary complexity each time supporting standards are updated. To prevent this insolvable situation, each harmonized standards should be accompanied by a separate part dedicated to the chain of dated references, allowing the Commission to cite in the OJEU this specific document without examining the already-cited harmonized standards. References should be limited to first level of supporting standards (direct references).

2.3 Alignment with international standards:

The Commission's approach has required Europe-specific modifications to international standards whether for technical or safety-relevant or legal purposes. This divergence increases development time, costs, and technical barriers to trade, putting European industry at a competitive disadvantage.

Ensuring alignment with international standards as proposed by Workstream 4 of the HLF is essential for certain industries. Since alignment of standards at international level is key to competitiveness of European industry on the international stage, we need to fully use the FA and the VA, based on the stakeholder needs.

Therefore, data to follow the process and to guide our engagement in international standardization is crucial. This also implies that the current conflict between EC and ISO/IEC over IPR needs to be resolved urgently. A possible way out is to reduce the legalistic approach related harmonized standards. A possible outcome could be to have a dual vote on European level. One vote by all stakeholders following the delegation principle confirming the state-of-the-art status of a standard and one vote by the ADCOs to have the confirmation for the use of the harmonized standard within market surveillance.

2.4 Alternative process

Expand Chapter IV (Article 13 and 14) to include identification of technical specification to conformity of legislation. While the objective is to support public procurement (Article 13), this exercise is currently being expanded to implementation of pieces of legislation beyond procurement. Opening this process helps in accelerating compliance through an

inclusive process and avoids duplication of efforts and resources. European Standardization Organizations (ESOs) would be able to lead on this activity, i.e. European Standardization Organizations Publicly Available Specifications (PAS) process or newly CEN-CENELEC adopted deliverable “Agile European Specifications”, with feedback from the Multi-Stakeholder Platform on standardization.

2.5 Inclusiveness

Ensuring inclusiveness of all relevant stakeholders by involving a wide range of stakeholders, especially from industry, including SMEs, societal stakeholders, National Standardization Bodies, and governments, is not just encouraged but crucial (Article 23). However, today, industry is slightly excluded from decision processes, creating some discrepancy between different part of the standardization stakeholders. We recommend active inclusion of industry in all stages. A practical implementation is assigning a permanent seat at the Committee of Standards.

In addition, in some specific cases, and mostly for emerging innovative areas, it should be allowed under strict condition, to invite European External expert to join meetings, and bring their expertise to the standardization group.

2.6 Transparency

Transparency on the activities and progress of standardization and the Commission's decisions by clarifying the notification rules and the use of the Commission's websites in the harmonization process (Article 10.5 and 10.9).

[1] The Economic Benefits of Standardization [macroeconomic-benefits-of-standardisaton.pdf](#)

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).



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