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Opinion of the European Economic and Social Committee

Strategic standardisation for a stronger single market

(own-initiative opinion)

(C/2026/3538)

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1. Conclusions and recommendations

1.1. The European Economic and Social Committee (EESC) stresses that inclusiveness is essential for the legitimacy and effectiveness of the European standardisation system and therefore calls for strengthened participation of SMEs, trade unions and civil society organisations, including adequate financial support and improved access to standardisation activities, while enhancing the efficiency of the system and ensuring the financial sustainability of the system at national level.

1.2. The EESC calls on the European Commission, in the context of the forthcoming revision of Regulation (EU) No 1025/2012 ([1]), to clearly reaffirm that European standardisation must remain a technical instrument supporting EU legislation and must not address issues that could fall within the scope of social dialogue, at European, national, sectoral, regional (provincial or local), company and establishment levels ([2]).

1.3. The EESC recommends that the revised Regulation introduce an explicit *non-encroachment principle* to ensure that standards do not regulate or indirectly affect matters related to social dialogue ([3]).

1.4. The EESC calls for the introduction of an *ex-ante* assessment mechanism for all European Commission standardisation requests, in order to verify their scope and potential implications for fundamental rights, social legislation and social partner prerogatives before the standardisation process begins.

([1]) Regulation (EU) No 1025/2012 of the European Parliament and of the Council of 25 October 2012 on European standardisation, amending Council Directives 89/686/EEC and 93/15/EEC and Directives 94/9/EC, 94/25/EC, 95/16/EC, 97/23/EC, 98/34/EC, 2004/22/EC, 2007/23/EC, 2009/23/EC and 2009/105/EC of the European Parliament and of the Council and repealing Council Decision 87/95/EEC and Decision No 1673/2006/EC of the European Parliament and of the Council (OJ L 316, 14.11.2012, p. 12, ELI: http://data.europa.eu/eli/reg/2012/1025/oj).

([2]) See the Joint Letter: Standardisation bodies must refrain from issuing social standards, signed by ETUC, Business Europe, SMEunited, SGI Europe on the 27 June 2025.

([3]) See the Joint Letter: Standardisation bodies must refrain from issuing social standards, signed by ETUC, Business Europe, SMEunited, SGI Europe on the 27 June 2025.

1.5. The EESC calls for greater transparency and accessibility within the European standardisation system, including improved public access to harmonised standards and clearer information on the composition and functioning of technical committees. This must ensure transparency, financial sustainability of the system and protection of intellectual property rights by European Standardisation Organisations (ESO).

1.6. The EESC emphasises the need for stronger coordination of the EU's position in international standardisation bodies in order to ensure that global standards remain aligned with EU legislation, policy objectives and high levels of protection.

1.7. The EESC calls on the European Commission to ensure full accessibility for persons with disabilities in the activities of European and national standardisation bodies, including procedures, materials, facilities and ICT systems, in line with Directive (EU) 2019/882 ([4]), while maintaining the integrity and composition of Annex III to Regulation 1025/2012.

1.8. The EESC underlines that European standardisation must remain a central tool for boosting the single market, industrial competitiveness and the EU's open strategic autonomy. The revision should ensure that the system continues to be industry-driven, while ensuring the effective participation of social and societal stakeholders and SMEs through simplified procedures, enhanced capacity building and greater representation on technical committees. Standards can provide extraordinary economic opportunities for SMEs and for the single market as a whole, not only as vital tools for compliance, but as an investment for growth.

2. **Background**

2.1. This own-initiative opinion aims to contribute proactively to the forthcoming revision of the EU standardisation framework announced by the European Commission, with a legislative proposal expected in the third quarter of 2026. The EESC considers this revision a timely opportunity to strengthen the single market and the EU's open strategic autonomy, while ensuring that standardisation remains a reliable, transparent and inclusive technical tool.

2.2. Standards should continue to support European competitiveness and innovation, in particular of SMEs, while remaining fully consistent with EU values, the Union *acquis* and the institutional architecture of social dialogue. At the same time, the development and application standards should contribute to a high level of protection for workers, consumers and the environment.

2.3. Standards are increasingly shaping industrial competitiveness, increasing the resilience of European value chains and influencing the organisation of work. Given their growing impact on the organisation of work, the introduction of digital technologies and human-machine interaction, standards should be developed with due consideration for their potential effects on working conditions, workers safety and skills, consumers, the environment, as well as SMEs' resources and skills.

2.4. In its evaluation of Regulation (EU) No 1025/2012 (SWD(2025) 170 final), the European Commission underlines that the European standardisation landscape has changed significantly since the Regulation entered into force. New challenges have emerged due to a changed geopolitical context, rapid technological development linked to the green and digital transitions, and the need to improve education and skills in standardisation. In this context, the European Commission stresses that the Regulation must fully exploit the strategic potential of European standards in order to support a resilient, green and digital single market and enable the EU to regain global leadership in standardisation processes. This also means that the capacity of stakeholders representing civil society organisations, trade unions and SMEs to participate effectively in standardisation processes must be strengthened where appropriate.

([4]) Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services (OJ L 151, 7.6.2019, p. 70, ELI: http://data.europa.eu/eli/dir/2019/882/oj).

3. General comments: the challenges of the European standardisation process

3.1. Over the last two decades, national, European and international standardisation systems have become an increasingly integrated ecosystem (of national, European and international standardisation bodies). As such, a shift has taken place whereby European standards are originating more often at international level. This exposes European standards to new challenges, including from the perspective of 'strategic autonomy' and 'Made in Europe'. Strengthening European leadership at international level will ensure that European interests are protected.

3.1.1. The EESC identifies several structural challenges that should be addressed in order to strengthen the single market and improve the legitimacy and effectiveness of the European standardisation system.

3.1.2. Timeliness and predictability must be improved by reducing delays along the entire chain from European Commission requests to drafting, assessment and publication, while safeguarding the participation of all interested parties, consensus-building and technical quality. Feasible ways of enhancing the speed and responsiveness of the system could be found by matching – ahead of starting the standardisation work – the workload with the available resources, including expert and secretariat resources. Consideration should also be given to accelerating the citation of harmonised standards, by establishing transparent and binding procedures, with clear deadlines and criteria for assessment and closer exchanges between Harmonised Standards (HAS) consultants and technical experts.

3.1.3. The legal and technical quality of harmonised standards must be ensured, so that standards fully comply with mandates and EU legal requirements, limiting rejections, revisions and litigation. This quality requirement should also ensure that standards contribute to ensuring a high level of protection of the interests of the stakeholders represented by the Annex III organisations.

3.1.4. Inclusiveness and balanced participation remain essential. Therefore, to increase the legitimacy and applicability of standards, the participation of SMEs and societal stakeholders, including trade unions, consumers and environmental stakeholders, should be fostered in both European and national standardisation bodies.

3.1.5. Transparency and accessibility must be ensured, given the relevance of harmonised and non-harmonised standards.

3.1.6. Governance arrangements and incentives must be improved to ensure accountability and responsiveness to political priorities, especially in the rapidly evolving green and digital sectors.

3.1.7. Particular attention should be paid to standards that address emerging technologies such as artificial intelligence, digital platforms and advanced automation, which may substantially transform work organisation and human-machine interaction.

3.1.8. The revision must safeguard social dialogue at European and national level. Standards must not address issues that could fall within the scope of social dialogue. This principle is fully shared by the European social partners and is grounded in the EU Treaties ([5]).

4. Suggested legislative directions

4.1. Regulation 1025/2012 only covers standards '*in support of Union legislation and policies*'. Alongside this, there are also some non-harmonised standards (national, European and/or international) that are directly cited in European legislation; and an unknown number of non-harmonised (national, European and/or international) standards that become part of national regulation. These two collections of standards – which complement the clearly identified collection of harmonised standards – remain largely unknown. As a consequence, standardisation and standards have far more significant effects on the Single Market than is currently acknowledged.

([5]) See the Joint Letter: Standardisation bodies must refrain from issuing social standards, signed by ETUC, Business Europe, SMEunited, SGI Europe on the 27 June 2025.

4.2. Therefore, the European Commission should develop instruments to evaluate the impact of non-harmonised standards produced by standardisation bodies. Indeed, these standards affect the internal market and shape companies' conduct within it. Moreover, several EU legal acts refer to non-harmonised standards, in some cases making their application mandatory.

4.3. The EESC supports the principle that standardisation must remain a technical exercise and should not regulate matters falling within the scope of social dialogue and collective bargaining, such as working conditions, workers' rights and personnel management. The European Commission should develop guidelines introducing an explicit non-encroachment principle, clarifying that standards shall not in any way affect the exercise of fundamental rights as recognised in the Member States and at Union level, or affect the right to negotiate, conclude and enforce collective agreements, or any matters covered by social dialogue at EU and national level.

4.4. The EESC reiterates that voluntary technical standardisation cannot and must not interfere with areas reserved by law for regulated professions. Specifically, technical standards cannot regulate reserved professional activities, entry requirements, professional skills, or ethical standards, which remain the exclusive responsibility of the legislator and professional regulations.

4.5. An *ex ante* scope assessment should be required for each standardisation request in order to identify any risk of overlap with social dialogue, fundamental rights, social legislation and with the areas reserved by law for regulated professions. Accordingly, every standardisation request should indicate whether – and to what extent – it affects these areas. Where risks are identified, the European Commission, standardisation bodies and their technical committees should give precedence to alternative instruments.

4.6. European and national standardisation bodies, as well as the technical committees established within them, must ensure the balanced participation of consumer and civil society organisations, environmental stakeholders, trade unions and SMEs. To guarantee meaningful participation, standardisation bodies should remove financial and administrative barriers as much as possible by allowing free access to and participation in standardisation activities for civil society organisations, trade unions and SMEs. Accessibility for persons with disabilities should also be ensured. In addition, these organisations should be provided with adequate financial resources, capacity-building programmes and training in standardisation, to strengthen their technical expertise, at both European and national level. To this end, mechanisms should be implemented to redistribute to the Annex III organisations the fees paid to participate in standardisation bodies.

4.7. The EESC underlines that European standardisation must remain a central tool for boosting the single market, industrial competitiveness and the EU's open strategic autonomy. The revision should ensure effective participation of SMEs through simplified procedures, enhanced capacity building and greater representation on technical committees. Standards can provide extraordinary economic opportunities for SMEs and for the single market as a whole, not only as vital tools for compliance, but as an investment for growth.

4.8. The EESC calls for transparent standardisation procedures. The composition of the technical committees within standardisation bodies at European and national level should be published on their websites.

4.9. Due to the increasing role of standards, unrestricted and free access is becoming a matter of rule of law and transparency. The EESC recommends guaranteeing at least easy and free read-only and barrier-free access to standards and clarifying responsibilities for ensuring public accessibility. At the same time, the financial sustainability of the system and protection of intellectual property rights should be ensured.

4.10. The EU should revise its international strategy for standardisation, particularly in the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC), ensuring that international standards do not lower the EU framework on safety, health and sustainability. This should include ensuring that international standards are consistent with internationally recognised labour standards and the protection of workers´ safety and health. The EU should also prevent standards inconsistent with its values and legislation from entering the single market without safeguards. To reduce this risk, the Regulation should stipulate that a product or service can be offered in the internal market only if it respects standards drafted, voted for and published by standardisation bodies that comply with the EU Standardisation Regulation.

5. **Guidelines for the revision of Regulation 1025/2012**

5.1. The EESC emphasises that harmonised standards should serve to support the technical implementation of legislation while not becoming a regulation tool. Harmonised standards must not replace, undermine, or encroach upon social legislation or collective agreements. Accordingly, the European Commission should not, through a request for one or more European standards, affect the right to negotiate, conclude and enforce collective agreements or the right to take industrial action, nor should it intervene in matters that are regulated through social dialogue at European or national level.

5.2. To ensure that harmonised standards remain technical, every European Commission request for a harmonised standard should include an assessment of whether it affects social dialogue, fundamental rights or social legislation. This assessment should then be reviewed by the Committee established under Article 22 of Regulation (EU) No 1025/2012. Annex III organisations should be informed by the Committee and given the opportunity to submit an opinion on the scope of the European Commission's request.

5.3. In critical policy domains, such as European defence, whose regulation should be screened by external influences and where the European strategy autonomy should be strictly implemented, the European Commission must be able to develop common specifications instead of requesting European Standards from European standards bodies. When drafting common specifications, the European Commission must make sure all relevant stakeholders are involved.

5.4. Quality should remain the priority over speed. While procedures must be streamlined through digitalisation and improved planning, shorter timelines must not weaken the careful deliberations needed to produce high-quality standards aligned with EU policies and values. Therefore, speed should not be promoted at the expense of inclusiveness and consensus. Moreover, standards that affect workplace equipment, digital systems or human-machine interaction should ensure that worker safety, health and ergonomic considerations are fully integrated from the design stage.

5.5. Inclusiveness must be treated as a condition of legitimacy, ensuring balanced participation by industry, including SMEs, consumer and civil society organisations, environmental stakeholders and trade unions supported by adequate resources. Accordingly, financial support for Annex III organisations should be increased, and the role of these organisations should be ensured and upheld. European stakeholder organisations are a key factor in the system and need to be safeguarded for the necessary democratic checks and balances and the promotion of EU values. It should be ensured that internationally rooted standards that will be taken up as European standards do not contravene EU objectives or undermine EU policy or legislation.

5.6. To achieve effective inclusiveness and ensure the legitimacy of the standardisation system, Art. 6.1 of the Regulation ('Access of SMEs to standards') should be amended. Currently, this paragraph consists of a non-exhaustive, non-binding list of measures that national standardisation bodies may take to support inclusiveness, access and effective participation of SMEs in standardisation at national level. In practice, Article 6.1 has resulted in uneven conditions for SME participation across different Member States. The existing list of measures and all its provisions should be made mandatory for both SMEs and consumer organisations, environmental stakeholders and trade unions. Additionally, the role of these stakeholder categories at European level, leveraging the role of the Annex III organisations, should be ensured and upheld.

5.7. In line with the jurisprudence of the Court of justice of the European Union ([6]), the EESC recommends guaranteeing at least easy and free read-only and barrier-free access to standards – through an accessible internet portal – and clarifying responsibilities for ensuring public accessibility, while ensuring the financial sustainability of the system and protection of intellectual property rights by ESOs.

5.8. Standardisation should contribute to sustainable competitiveness, promoting innovation, productivity and resilience while integrating safety, health and the environment.

5.9. The EESC calls for the revised Regulation to include a requirement that, when standardisation bodies draft, vote on and publish standards that become European harmonised standards, that they require these bodies to comply with the European regulation on standardisation.

([6]) European Court of Justice, C-588/21 P (Malamud); C-160/20; C-613/14 (James Elliott).

5.10. Monitoring and accountability should be increased through clear indicators on timelines, quality, inclusiveness and impact, together with corrective mechanisms when necessary. Measures at national level in this sense could be implemented by amending Article 6.3 of the Regulation, mandating that National Standards Bodies gather and make available data on the access and participation of stakeholders in standardisation at national level.

Brussels, 29 April 2026.

The President
of the European Economic and Social Committee
Séamus BOLAND