

Position Paper

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Ensuring a Strong, Future-Proof European Standardisation System

The European Standardisation System (ESS) continues to be a well-functioning framework that ensures Europe's global competitiveness by delivering high-quality standards. The New Legislative Framework (NLF) has been pivotal to the success of the Single Market. In the Public-Private Partnership of the ESS, European legislators can establish essential requirements, while technical implementation standards are developed by experts from across Europe. The PPP ensures that profound knowledge of industry, innovation, and market needs contribute to shaping harmonised European Standards (hENs). This promotes widespread acceptance and implementation of these standards among European stakeholders.

A revision of the Standardisation Regulation should focus on re-establishing core benefits of the system that have been limited through the changes made to the ESS over the last years.

Firstly, the **alignment of harmonised standards with international standards** of ISO and IEC facilitates global market access and lowers costs by eliminating the need for different product specifications across various markets. The alignment also ensures optimal resource utilization and expertise, while preventing redundant efforts in standard development for European standardisation experts.

Secondly, the **fast listing of harmonised standards** enables easier market access within the EU and reduces compliance burdens. Early access to harmonised standards offers legal certainty through the presumption of conformity and eliminates the need to involve third parties in conformity assessments, resulting in crucial cost savings, especially for SMEs.

We therefore advocate for **only necessary and targeted amendments** to Regulation 1025/2012 that address implementation challenges in fulfilling the above goals without destabilising the proven foundation of the ESS.

Improvements to the Commission's procedures

We would like to point out that the call for evidence proposes two distinct types of amendments:

1. Improvements to the Commission's procedures and amendments to Regulation 1025/2012 itself, and
2. Improvements in the processes and practices of the European Standardisation Organisations (ESOs).

We ask the Commission to avoid addressing the second point through legislative revision. Regulation 1025/2012 should continue to define the overarching framework, while the design and operation of processes rightly remain the responsibility of the ESOs. To address this second point and improve the ESO's processes, the Commission should instead establish structured dialogues in workshops with ESOs and industry to jointly identify and implement improvements, such as enhancing digitalisation, streamlining processes and support in creating formally correct standards during drafting.

In the revision, we urge the Commission to primarily the first point and **address issues within the scope of the Regulation 1025/2012, such as improving its own internal procedures:**

- **Early involvement of the Commission** in the development of harmonised standards, to set expectations and provide ongoing and clear feedback throughout the drafting phase. This avoids long delays through and unexpected outcomes by the assessment procedures currently in place.
- **Set clear deadlines for procedural steps on the Commission's side**, e.g. the time required to assess Annex Z, thereby reducing unnecessary delays in the citation of standards in the OJEU.
- **Minimise the listing of standards with restrictions**, to avoid frustration among technical experts and to give manufacturers greater legal certainty.
- **Ensure sufficient time for standards development**, particularly in emerging areas such as AI or cybersecurity, where there is limited existing standards infrastructure and expert networks.
- **Facilitate the incorporation of standards developed by consortia and fora** into harmonised standards, to keep pace with technological advances by not blocking normative references of such standards when assessing harmonised standards, such as under the CRA.

Opposition to In-House Standard Development

Bitkom **strongly opposes any move towards developing standards within the Commission**, which undermines the established public-private standardisation model and risk fragmenting the European system. We also note with concern that the notion of **developing standards 'in-house'** appears to overlap conceptually with the introduction of **common specifications**. In this context, we emphasise:

- Developing common specifications outside the ESO's **consensus-based and inclusive system** contradicts the Commission's own objective of involving diverse stakeholders, including SMEs.
- **Common specifications should remain a measure of last resort**, as clearly set out in Article 20 of the Machinery Regulation, which provides a suitable model for wording such safeguards.
- Ensuring **transparent, open, and inclusive processes in the development of common specifications** would enhance industry acceptance. However, the Commission has yet to provide details on how it plans to implement such principles.

Reducing pressure on the System

We would like to remind the Commission that the fastest way to improve implementability of regulations, is to 1) introduce **fewer new regulations**, which reduces the criticality of harmonised standards for cost-efficient conformity and allows experts to dedicate more time to the development of fewer standards, and 2) **aligning regulations with the NLF**, which enhances the transparency of requirements on manufacturers.

The bureaucratic demands on industry should also be kept in mind when creating additional structures for governance and oversight. Hence, existing mechanisms should be leveraged as a priority—for example, using the High-Level Forum (HLF) to coordinate on strategic issues and drawing on the Joint Research Centre (JRC) for technical expertise during the drafting processes of the ESOs.

Bitkom represents more than 2,200 companies from the digital economy. They generate an annual turnover of 200 billion euros in Germany and employ more than 2 million people. Among the members are 1,000 small and medium-sized businesses, over 500 start-ups and almost all global players. These companies provide services in software, IT, telecommunications or the internet, produce hardware and consumer electronics, work in digital media, create content, operate platforms or are in other ways affiliated with the digital economy. 82 percent of the members' headquarters are in Germany, 8 percent in the rest of the EU and 7 percent in the US. 3 percent are from other regions of the world. Bitkom promotes and drives the digital transformation of the German economy and advocates for citizens to participate in and benefit from digitalisation. At the heart of Bitkom's concerns are ensuring a strong European digital policy and a fully integrated digital single market, as well as making Germany a key driver of digital change in Europe and the world.

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