



SBS, EBC and SMEUnited joint reply to the public consultation on the revision of Regulation 1025/2012 on European standardisation

December 2025

KEY MESSAGES:

- While Regulation 1025/2012 overall has been a success since its inception, achieving tangible improvements on the inclusiveness of the European Standardisation and its overall cost-efficiency and coherence, further advancements should be achieved, especially on the speed and market responsiveness of the standards-development process. Improvements in terms of speed, however, should not jeopardise genuine consensus or diminish in any way the roles and prerogatives of SME experts in standardisation and the value of their contributions.
- Increased inclusiveness, thanks in large part to the role and activity of Annex III organisations, is among the areas where Regulation 1025 has performed the best. Further improvements, building on the strong foundations of the Regulation, can be achieved by taking concrete measures to increase the access and effective participation of SMEs in standardisation at both national and European level. SBS proposes specific amendments to Articles 4, 5 and 6 of the Regulation.
- SBS, EBC and SMEUnited applaud the strategic approach to standardisation pursued by the European Commission since the 2022 Standardisation Strategy. However, the European ambition to be a global standards-setter has to be backed by a consistent and robust level of funding, both by the European Commission and by Member States. Additionally, an increased coordination among European actors in international standardisation should be pursued, including by further facilitating the access and participation of SME experts at international level.

- SBS, EBC and SMEUnited understand the need in principle for an alternative fallback option, such as common specifications, when requested harmonised standards (hENs) are not delivered by the European Standardisation Organisations. However, the latest Commission proposal in Omnibus IV still does not provide all the necessary criteria and clarity that are a precondition for the future rollout of such instrument. In any case, common specifications should only be considered as a last resort measure. The primacy of stakeholder-driven hENs must be preserved as the main way to facilitate compliance and provide presumption of conformity.
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Regulation 1025/2012 on European standardisation (from here on, “the Regulation”) is the legislative backbone of the European Standardisation System (ESS), and a centrepiece of the Single Market. The ESS remains the most inclusive standardisation system in the world. There is no framework outside of Europe that provides a more balanced participation and permeability of stakeholders in the standardisation process. From that point of view, **the Regulation represents a big success**, also supporting the overall efficiency and coherence of the standardisation system.

Stronger inclusiveness framework and participation translate to higher-quality standards that better reflect the needs of SMEs and ultimately help them do business. SBS sees this positive trend reflected in the evaluations carried out using the [SBS SME Compatibility Test](#), which analyses and rates European and international standards in terms of their SME-friendliness.

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However, it is clear that **there are areas where the ESS should be improved, building on the solid foundations laid down by the Regulation and not pursuing a complete overhaul of the system.** The Regulation can help address the inherent imbalance of any standardisation system, where due to time, financial and capacity constraints SMEs struggle to achieve a critical mass of representation in technical bodies compared to large companies. However, further work is needed to ensure that European standards are developed for SMEs and with SMEs sitting at the table.

This revision is a great opportunity to further improve the system and **achieve three main goals** that would drastically increase the benefits that SMEs can derive from standardisation:

- **Increasing the development speed and market responsiveness of European standards** helps SMEs to mitigate the risk of legal and technical uncertainty and allows them to access new markets, invest and grow.
- **Further improve the inclusiveness of the system at national and European level.** Standards that do not consider the needs and specificities of SMEs will lead to increased burdens, much lower uptake of standards and loss of business opportunities for the European economy as a whole.

- **Strengthening Europe's role as a global standards-setter** would help SMEs internationalise and access new markets. The ESS is the most inclusive standardisation system in the world, and Europe must be a leader in international standardisation to ensure inclusiveness at a global level.

Speed and market responsiveness of the European Standardisation System (ESS)

SBS, EBC and SMEUnited agree that the ESS has to become more agile and market responsive. Some changes, like the **proposal to establish and systematically use machine-readable data formats** and shared online authoring tools to draft European standards outlined in [the Single Market Strategy](#), would **accelerate the standards development process**, with no downsides in terms of quality and inclusiveness.

Most commonly, however, **speed in standardisation comes at a price**. We believe that **speed should not come at the expense of inclusiveness** or the ability of all relevant stakeholders, including SMEs, to engage meaningfully in the standardisation process. It is key to support the acceptance of standards while ensuring high quality and SME-friendliness. Therefore, **measures to increase the speed of the standards development process must not hinder genuine consensus at all stages of the drafting of standards**. They also must not unduly damage SMEs, their role and participation in the system, as well as their opportunities to harness the economic benefits of the use of standards.

Standardisation timelines should be explicitly aligned with implementation deadlines set in EU legislation, especially where compliance depends on harmonised standards. Recent legislative cycles have demonstrated recurring gaps between legal applicability and standards availability. Ensuring synchronisation would significantly reduce burdens on SMEs.

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SBS, EBC and SMEUnited proposals to improve speed and market responsiveness

- **Accept that Technical Specifications (TS), faster-developing and more flexible deliverables, can provide presumption of conformity.** Such an approach would be particularly useful for SMEs operating in fast-paced sectors by enabling them to bring compliant products to market more quickly. Should there be a market need for a harmonised standard (hEN) to be developed, that can follow at a later stage.

Impact: Faster availability of deliverables giving presumption of conformity. Reduction in legal uncertainty. Quicker systemic response to new market needs and technologies.

- **Pair up legislation and underlying standardisation priorities in a more timely and efficient manner.** This can be achieved by launching a first standardisation request (SR) for European standards in support of EU policy priorities alongside the legislative proposal that the SR refers to. A second SR requesting hENs would then be launched once the final legal text is available.

This would allow the bulk of the standardisation work to proceed while the legislative process is ongoing, drastically saving time. Early standardisation requests should be particularly prioritised in sectors characterised by extensive technical content (e.g.: construction), where standardisation work cannot realistically begin only after legislation is finalised.

Impact: More efficiency, avoiding duplicating the time needed to develop both legislation and standards. Better coordination and alignment of legislative and standardisation priorities.

- **Speed up the citation of hENs by establishing transparent and binding procedures, with clear deadlines, criteria and justifications for delays.** Additionally, establish stronger feedback loop and involvement by the Harmonised Standards (HAS) consultants during the development process. It is also essential to guarantee the continuity of the assessment system itself, avoiding disruptions, such as gaps in contracting arrangements, which have previously led to significant backlogs in assessment and delayed citation.

Impact: More efficient use of time throughout the standards-development process and at the final assessment and citation stages.

- **Map and assess existing standards**, checking if they can be used or adapted to satisfy EHSRs across different pieces of legislation. This approach can help speeding up the standards-development process and avoid an excessive proliferation and possible overlap of standards.

Impact: Avoid an excessive proliferation of standards, leading to confusion, suboptimal allocation of resources and, ultimately, lower use and uptake of standards by SMEs.

- **Maintain and fully implement Art. 13 and 14 of the Regulation**, using the Multistakeholder Platform (MSP) to identify existing ICT specifications to be used in public procurement.

Impact: Quicker identification of relevant ICT standardisation, by a body where SMEs are well represented. Positive impact on interoperability. Avoid an excessive proliferation of standards.

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Inclusiveness and balanced stakeholder representation

Tangible improvements in inclusiveness and effective stakeholder participation since the inception of the Regulation were **highlighted both in the report on the evaluation of the Regulation** and, particularly, in the accompanying study¹. This progress is largely due to **Annex III of the Regulation, which identifies recognised representative organisations for stakeholder categories** that are typically underrepresented or lack resources to participate in standardisation. These organisations are granted additional rights and prerogatives in the development of hENs and vis á vis the ESOs.

¹ [Evaluation study of the regulation \(EU\) 1025/2012 on European standardisation, p.47](#)

As the Annex III organisation charged with representing SME interests in standardisation, **SBS has seen [a consistent increase](#) in the number of experts financed, technical bodies** and work items followed, increasing work in standardisation areas [in support of EU policy priorities](#), particularly regarding the twin transition. In 2025 **SBS nominated and financed the work of 77 experts, active in over 260 technical bodies** at European and international level (CEN, CENELEC, ETSI, ISO and IEC).

In this way, **SBS contributes to the vital role of standardisation in support of European competitiveness and EU policy priorities**, particularly in digitalisation and sustainability, bringing the **voice and expertise of European SMEs** to the legislative and standardisation processes. SBS experts are active in CEN, CENELEC and ETSI technical committees developing standards in support of the AI Act, the Cyberresilience Act, the Data Act and the Digital Product Passport, among many others.

That said, there is still room for improvement. **SMEs still face financial and capacity constraints to participate in standardisation both at national and European level, as well as severe challenges in terms of access and balanced participation in the system** (e.g.: difficulty to interact with National Standards Bodies (NSBs), high costs to access national committees and/or to buy standards, isolation during technical discussions...). These challenges are discussed at length in the [Report and Recommendations on inclusiveness in standardisation at the national level produced by the High-Level Forum on European standardisation \(HLF\)](#), for which SBS was the lead drafter.

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SBS, EBC and SMEunited proposals to improve inclusiveness and balanced stakeholder participation

- **Add a new Art. 4.4 point (c)** stating that [National Standards Bodies shall] *“ensure a balanced participation of different stakeholders’ groups, including SMEs, civil society and academia, within national mirror committees, and proactively reach out to national stakeholders’ representatives as mitigation when such imbalances are identified”*.

Impact: Strengthen representation of SMEs at national level. Influence in favour of SMEs the development of the national positions to be taken by the NSB delegations at European and international level, via the national delegation principle.

- **Slightly amend Article 5.1**, by stating that “(...) [ESOs shall] ~~encourage and~~ facilitate ~~and ensure the conditions for~~ such representation and participation through the European stakeholder organisations receiving Union financing in accordance with this Regulation. (...)”

Impact: Strengthen the value added, role and rights of Annex III organisations within the ESOs.

- **Amend Article 5.1(a)**, by stating that *“the proposal and acceptance of new work items, including by requiring that every New Work Item Proposal shall state how it will comply with [CEN-CENELEC Guide 17 - Guidance for writing standards taking into account SMEs needs](#)”*;

Impact: Put the value, needs and specificities of SMEs at the heart of every standard.

- **Amend [Art. 6.1 of the Regulation \(“Access of SMEs to standards”\)](#).** Under the current Regulation, this paragraph consists of a non-exhaustive, non-binding list of measures that NSBs may take to support inclusiveness, access and effective participation of SMEs in standardisation at national level. In practice, this has resulted in uneven conditions for SME participation across different Member States. The existing list of measures should be expanded to include the HLF recommendations, and all its provisions made mandatory.

Impact: Strengthen representation of SME at the national level. Harmonise the conditions and incentives for participation in standardisation across different Member States.

- **Amend and integrate Art. 6.3 of the Regulation**, mandating that the NSBs, within the framework of their annual reports to be sent to the ESOs, shall gather and make available data on access and participation of stakeholders in standardisation at national level. Where data about SME at national level is made available, SBS commits to reaching out to national SMEs and associations to increase their awareness of standardisation and contribute to their capacity building. SBS has a track record of such initiatives, organising [national seminars](#) in different countries, bringing together SME associations and their experts and NSBs.

Impact: Increase the amount of data available on SMEs involved in standardisation, increase awareness, capacity and access of SME experts to European and international standardisation.

- **Do not amend Annex III of the Regulation.** SBS and the other Annex III organisations are a positive driver “for enhancing stakeholder participation in standardisation”², as recognised in several recent EC documents. Any expansion of Annex III, even if matched by a proportional increase in the associated funding, would dilute and diminish the impact, role and prerogatives of Annex III associations vis á vis policymakers and standards development organisations alike.

Impact: Fragmentation of Annex III organisations will lead to a dilution of their value, role and impact, difficulty to prioritise already limited resources and lack of a coherent approach to the systemic representation and promotion of SME and civil society interests in standardisation.

- **Ponder very carefully any expansion of the number of recognised Standards Development Organisations (SDOs) that may develop hENs (Annex I).** Diversification of SDOs may bring certain benefits, but it will likely lead to more fragmentation and complexity of the system, with no guarantee that key principles such as openness and inclusiveness will be upheld equally. Such fragmentation would place additional demands on already scarce resources making it more difficult for SME representatives and experts to contribute meaningfully. Any expansion of SDOs would have therefore to be conditional to criteria that provide strict guarantees of openness, transparency and balanced stakeholder participation.

² [Interim evaluation of the Single Market Programme, p. 248](#)

Impact: Fragmentation of the SDOs will lead to fragmentation of the capacity of SME organisations to contribute to in a coherent way to standardisation, increasing coordination and administrative costs and stretching their already scarce resources even thinner.

Strengthen the EU's impact on international standardisation

Internationalisation of standardisation is positive in principle, as it gives common rules and eliminates barriers. A technical alignment as wide as possible ultimately is one of the goals of standardisation and potentially opens up large economic opportunities to European companies in other regions. However, it has to be recognised that international standardisation in certain areas is dominated by non-EU countries and interests. **Standards tailored to large non-EU companies can lead to them squeezing opportunities from SMEs in the Single Market, rather than opening up new markets to European companies and SMEs in other regions.**

SBS, EBC and SMEunited fully support the European ambition to be a global standards-setter and appreciates the strategic approach to standardisation taken by the Commission since the 2022 Standardisation Strategy. SMEs have a strong role to play in this sense, if properly supported in their participation at all levels of the standardisation system, leveraging the national delegation principle. Under this principle each NSB has to develop a binding, consensus national position, to be upheld by the national delegation at European and international level. Therefore, **a stronger role of SMEs in determining each national position is a positive multiplier at all levels of the system.**

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The interplay between European and international standardisation is particularly crucial in ICT standards, which have an increasingly far-reaching impact across all economic sectors. **ICT standards can be vital in achieving interoperability of technologies, and opening up proprietary ecosystems, allowing SMEs to thrive at all stages of the relevant value chains.** SMEs would greatly benefit from such interoperability, since unlike larger companies they do not have the capacity of vertically integrating their products, services or processes.

SBS, EBC and SMEunited proposals to strengthen Europe's role as global standards setter

- **Back the ambition to be a global standards-setter with an adequate level of investment, both by the European Commission and by Member States.** In particular, increased coordination and a strategic and financially robust approach to standardisation can lead to European actors have a stronger presence and impact in terms of experts and hold more Technical Committee secretariats and leadership positions in international standardisation.
Impact: EU leadership in international standardisation, bringing the inclusiveness of the ESS on the global stage, supporting SMEs' participation, business opportunities and competitiveness.

- **Increase coordination among European actors in international standardisation.** This should extend to European NSBs supporting the participation and active role of Annex III organisations at international level (e.g.: by voting in favour of their liaison requests to join ISO and IEC Technical Committees and Subcommittees).
Impact: Stronger coordination and increased role and impact of European stakeholders and SMEs in international standardisation

Common specifications

SBS, EBC and SMEUnited understands the need for an alternative fall-back option, in the form of common specifications, when requested hENs are not delivered by the ESOs. However, as of the latest Commission proposal outlined in the [Omnibus IV](#), several areas of concern remain:

First off, in the absence of an established ad-hoc process for the development of common specifications, the comitology procedure under Regulation 182/2011 for the approval of implementing acts applies. This Regulation **does not give sufficient guarantees towards stakeholder involvement since it does not set rules or requirements in terms of stakeholder participation in the drafting of an implementing act.** This leads to insufficient clarity on the mechanism for the gathering of input from different stakeholders in the development of common specifications. **Using comitology to adopt common specifications therefore risks bypassing the inclusive framework established by Regulation 1025/2012.**

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There is still a lack of clarity on the criteria to trigger the process of development of common specifications. So far only vague wording is provided, mentioning “*absence of requested standards*”, “*insufficient quality*” and “*urgent policy need*”, with no clear criteria and procedure.

SBS, EBC and SMEUnited reiterate that common specifications should only be considered as a last resort measure. The primacy of stakeholder-driven harmonised standards must be preserved as the main way to facilitate compliance and provide presumption of conformity, following a market-based and stakeholder-driven approach to standards development. Creating a parallel development process and additional specifications would also contribute to an excessive proliferation of deliverables, potentially creating confusion among users on which standard to comply with.

We believe that the wording allowing the development of common specifications under [Art.20 of Regulation 1230/2023 \(“Machinery Regulation”\)](#) would offer tangible improvements. Articles 20.3 and 20.4 give some needed clarification regarding the procedure and the fora to be consulted for the development of common specifications, and Article 20.5 clearly prescribes that “*The Commission (...) shall duly consult all relevant stakeholders*” in the development of the specifications.

Similarly, in the construction sector, the new Construction Products Regulation (EU) 2024/3110 explicitly establishes a structured and mandatory framework for stakeholder involvement through the CPR Acquis. The Regulation requires the Commission to organise the development of harmonised technical specifications via dedicated CPR Acquis subgroups, where all relevant stakeholders are formally involved. This legally binding structure demonstrates that EU legislation can include clear and enforceable rules on stakeholder engagement in technical drafting processes, providing predictability and safeguarding balanced participation.

Funding of the European Standardisation System (ESS)

Maintaining a strong and responsive ESS, as well as any ambition of European leadership on the international stage, must be accompanied by adequate financial backing. In particular under the upcoming new MFF, **it is crucial to ensure robust and consistent funding of the standardisation system across the different annual EU budgets.** Past experience (e.g.: gaps in the financing of the HAS consultants system in 2022) has shown that breakdowns or interruptions in funding, however momentary, can have long-lasting negative effects on the functioning of the system.

Standards, the financing of the ESS and of the work of European actors in international standardisation have to be considered as strategic priorities both by the EU and by the Member States, as vital tools underpinning the Single Market and the health and competitiveness of the European economy as a whole. One of the areas for improvement that emerged from the evaluation of the Regulation, is the need for **a more sustained and coordinated level of strategic, political and financial involvement of Member States in standardisation and their ability and willingness to liaise with stakeholders, particularly SMEs** and their representatives, active in standardisation. The Commission's financial commitment is and will remain essential to guarantee the inclusiveness of the system and the participation of SMEs in the standardisation work at the European level.

SBS, EBC and SMEunited also stress the importance of maintaining a centralised source of funding for the ESS under one financial envelope (currently the Single Market Programme – SMP), rather than dispersing it across multiple smaller financing streams.

Education to standardisation

Europe cannot afford to lose the know-how and expertise of the current, often aging, generation of standardisation **experts without properly replacing it.** Investing in education to standardisation and **integrating standardisation aspects in existing curricula in universities, vocational training and life-long learning** is a vital challenge in order for Europe to maintain a leading role in standardisation on the global stage. This would create an overwhelming barrier to all stakeholders, but particularly to SMEs, in terms of participation in standardisation both at national and European level.

SBS is already acting in this direction, as one of the partners of [EDU4Standards](#), which will design teaching modules for different education levels and for lifelong learning, to help grow the next generation of European standardisers. Robust funding should be foreseen both at European and Member States level, also in cooperation with SME associations and academia. To address one of the barriers highlighted by academia stakeholders in the HLF report on inclusiveness and make standardisation more appealing to academia, **SBS recommends that academics that contribute to the development of a standard must see their contribution recognised as an official publication.**

CONCLUSION:

The revision of Regulation 1025/2012 is a great opportunity to build on the achievements of the European Standardisation System and further improve its inclusiveness, market responsiveness and impact. In this paper SBS brings forward concrete and feasible proposals to be readily implemented and that would drastically increase the benefits that SMEs can derive from standardisation.

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. The only way to achieve this, is to make sure that SMEs have as much impact as possible.

For SBS, EBC and SMEunited, the voices of European SMEs in standardisation, representing 22 million SMEs all across Europe, this is our mission!



Small Business Standards (SBS) is the European association representing and supporting small and medium-sized companies (SMEs) in the standardisation process, both at European and international levels.

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