



JOINT DECLARATION

September 2023

Joint SBS-EBC-SMEUnited reply to the Call for Evidence consultation Evaluation of Regulation 1025/2012 on European Standardisation

Key points

SBS, EBC and SMEUnited welcome the evaluation of Regulation 1025/2012 on European standardisation and is looking forward to fully engaging in the process, starting with this reply to the initial call for evidence.

SBS, EBC and SMEUnited support the current text of Regulation 1025/2012 and believe **that the Regulation is still fit for purpose and that at this time it is not necessary to amend its main provisions. The focus should rather be put on their full and effective implementation.**

SBS, EBC and SMEUnited believe that the main emphasis for a more complete and effective implementation should be put on articles 5 and 6 of the Regulation, concerning stakeholder participation in European standardisation and access of SMEs to standards both at European and national level.

The need to focus on further implementation

SMEs represent the core of Europe's economy and are potentially the biggest users of standards. It is, therefore, essential to ensure they are around the table and their interests properly represented in the standards development and decision-making process at all levels of the standardisation system.

SBS, EBC and SMEUnited also take this occasion to reiterate the vital importance of providing the European standardisation system with the financial resources necessary to ensure its full functioning and the full and proper implementation of the provisions of Regulation 1025/2012. All the different aspects of the European standardisation system, from inclusiveness and participation of underrepresented stakeholders and their representatives, to the HaS consultants system, to many others, necessitate a consistent and adequate level of financing to function properly.

SBS, EBC and SMEUnited support the current text of Regulation 1025/2012 and believe that the Regulation is still fit for purpose and that at this time it is not necessary to amend its main principles and provisions.

From our perspective, the proposal and adoption of a very targeted technical amendment (Regulation 2480/2022) to the Regulation reinforces the idea that the foundation of Regulation 1025/2012 is still solid and fit for purpose. The focus should rather be on supporting the effective implementation of the current provisions of the Regulation to ensure its principles are effectively implemented and that standards in support of EU legislation and policies can be delivered in a timely manner.

This is especially the case with articles 5 and 6 of the Regulation regarding stakeholder participation in European standardisation and access of SMEs to standards.

Although there have been several measures put in place to implement the provisions of the Regulation, SBS, EBC and SMEUnited believe that there are still improvements needed to ensure the effective participation of stakeholders and access to standards at the European and national levels. In 2022 SBS, jointly with the other so-called “Annex III organisations” (representing the interests of consumers, environmental stakeholders and trade unions in standardisation), put forward concrete proposals for stronger inclusiveness and representation of the interests of all stakeholders to the ETSI Board and General Assembly and [CEN and CENELEC](#).

Increasing further SME participation at the national level is essential to increase the SME influence in the development of European and international standards. Some National Standards Bodies (NSBs) already have in place measures to facilitate the access of SMEs to the standardisation work such as free access to national mirror committees, reduced fees when buying standards, dedicated services and contact points or online platforms to contribute to drafts under Enquiry. Nevertheless, these and other SME-supporting measures are not implemented in all countries and it is important to share best practices and to identify those areas where SME participation at the national level could be further improved. To this respect, the work being undertaken under the High-Level Forum on European Standardisation under its Workstream on NSB peer review including SME and civil society inclusiveness is of relevance and may be considered during the evaluation process.

Finally, regarding Article 10 and the drafting of European standards in support of EU policies and legislation, the Commission and EFTA have been working with the European Standards Organisations under the Task Force “Timely delivery of European standards for a Green and Digital, Single and Global Market” to deliver concrete solutions that would improve the current process. The new processes and mechanisms discussed will need some time to prove whether they are effective in improving the delivery of harmonised and crucial standards for Europe. Embarking on a revision of the Regulation at this stage would therefore be premature.



Small Business Standards (SBS)' goal is to represent and support SMEs in the standardisation process, both at the EU and international levels.

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European Builders Confederation (EBC) is the European non-profit professional organisation representing and promoting the interests SMEs and craftsmen in the construction sector, in close coordination with its national member organisations.

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SMEUnited is the association of Crafts and SMEs in Europe with 67 member organisations from over 30 European countries. SMEUnited represents national cross-sectoral SME federations, European SME branch organisations and associate members. SMEUnited is a recognised employers' organisation and European Social Partner. SMEUnited was formerly known as UEAPME.

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