

Commentary on the Leaked Draft of the Regulation on European Standardisation

Safeguarding Europe's Market-Driven and Internationally Aligned Standardisation System

25.09.2026

Ahead of the anticipated publication of the revised European Standardisation Regulation, as part of the European Product Package (EPP), in early October, our initial analysis of the leaked draft raises serious concerns. While we fully support the objective of improving the European standardisation framework, we see **considerable risks in the overall direction** of the leaked draft and its implications for the functioning of the standardisation system, the international alignment and overall competitiveness.

Unequal Timelines Undermine Genuine Acceleration

The leaked draft risks creating an imbalance in procedural requirements by imposing detailed and **legally binding obligations** on European Standardisation Organisations (ESOs) and National Standardisation Bodies (NSBs), while leaving the Commission considerably greater **procedural flexibility**. This imbalance is particularly evident in the stated objective of accelerating the delivery of harmonised standards: the draft grants the Commission up to **21 months** for its own procedural steps (**twelve months** to prepare and adopt a Standardisation Request, **six months** to assess finished standards submitted by the ESOs and a further **three months** for citation of their reference in the Official Journal of the European Union) while requiring the ESOs to shorten their processes drastically. Evidently, delays do not arise solely within the ESOs but also from the Commission's own procedures.

Genuine **acceleration must therefore address the entire process** through shorter, equally ambitious and legally binding deadlines **for all actors**, clearer Standardisation Requests, as well as streamlined assessment and citation procedures. The Commission should not combine increased influence over the system with less stringent obligations for its own actions.

We therefore urge the Commission to apply **binding obligations and deadlines consistently to all actors**. Acceleration will only be credible if the Commission substantially reduces the envisaged 21-month timeframe for its own procedures.

International Alignment at Risk

The competitiveness of the European economy depends heavily on **access to global markets**. International standards facilitate trade, prevent technical barriers and support European companies' access to global markets. Close alignment between European and international standardisation is therefore essential.

However, **Art. 35** of the draft – despite being framed as an “international-first principle” – **does not sufficiently safeguard this alignment**. The proposal allows the Commission to specifically deviate from international standards where it considers them “ineffective or inappropriate”. These insufficiently defined terms give the Commission considerable discretion and could lead to divergent requirements in Europe and the rest of the world, significantly weakening the competitiveness and attractiveness of the European market.

International standards must therefore remain the **preferred basis for European standardisation** wherever they are available and suitable. Where specific European regulatory requirements need to be addressed, the preferred approach should be to adapt or complement the international standard rather than depart from globally recognised solutions. **Deviations should be limited** to duly justified exceptional cases and subject to objective criteria and a transparent assessment involving the relevant sector-specific technical experts. They must not depend on the Commission's discretion alone. We therefore urge the Commission to **safeguard the international-first principle** as a substantive guiding principle of European standardisation and to ensure that it is not undermined by broadly defined exceptions. Established mechanisms for international cooperation, in particular the **Vienna Agreement and Frankfurt Agreement**, must also be fully respected, preserved and strengthened.

Overreaching Governance and Transparency Requirements

The draft extends the Commission's reach **beyond its appropriate institutional role** by interfering with the pillars of standardisation as well as the internal governance and organisational structures of privately governed ESOs and NSBs.

Regarding **transparency requirements**, **Art. 4** goes beyond what is necessary and proportionate. Requiring the disclosure of participating organisations and stakeholders, including the “interests and objectives” they represent, raises questions regarding personal data, confidentiality, commercially sensitive information and the national delegation principle. Moreover, the **legitimacy of a technical outcome must not be assessed solely on the basis of the formal composition** of the relevant committee. Standardisation organisations already ensure open participation, but they cannot compel individual stakeholder groups to take part. Their absence should therefore not be used as an indication of deficiencies in the standardisation process.

In addition, **Art. 23** allows the Commission to set specific requirements regarding the participation of targeted stakeholders in individual Standardisation Requests. While effective stakeholder participation is essential, the Commission **should not determine the composition of technical committees** on a case-by-case basis. Such intervention risks introducing political considerations into expert-driven processes and **weakening the market-driven character of standardisation**.

Finally, the reporting obligations under **Art. 14** concerning cooperation agreements with other standard development organisations **should be limited to information** that is strictly necessary for the implementation of the Regulation. Such agreements may contain confidential terms and strategically sensitive information. Any reporting requirements must therefore be proportionate, reciprocal and subject to effective confidentiality safeguards.

We therefore urge the Commission to limit its intervention and respect the **autonomy of ESOs and NSBs**. Transparency and participation requirements must be proportionate and not interfere with the independence of standardisation committees.

The Commission should pursue **a balanced reform** that preserves the institutional autonomy of ESOs and NSBs, safeguards international alignment, ensures proportionate transparency and participation requirements, and applies binding obligations and deadlines consistently to all actors.

The market-driven character and financial sustainability of the European standardisation system must remain fully protected.

About the BDI

The BDI represents the interests of German industry to political decision-makers. In doing so, it supports companies in global competition. It has an extensive network in Germany and Europe, in all important markets and in international organisations. The BDI provides political support for international market development. It also offers information and economic policy advice on all industry-related topics. The BDI is the umbrella organisation for German industry and industry-related service providers. It represents 39 industry associations and more than 100,000 companies with around eight million employees. Membership is voluntary. Fifteen regional offices represent the interests of industry at the regional level.

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