



SBS comments on the amendment to Regulation 1025/2012 on European standardisation

April 2022

Introduction

On the 2nd of February the European Commission published the European Standardisation Strategy. The strategy is accompanied by a targeted [amendment to the Regulation 1025/2012](#) on European Standardisation. According to the Commission's proposal, the amendment aims at ensuring a balanced representation of all European stakeholders when the European Standards Organisations (ESOs) take decisions related to standards and other deliverables requested by the European Commission under article 10 (1) of the Regulation.

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The need for a balanced representation of interests

SMEs represent the core of Europe's economy and are potentially the biggest user 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.

Although there have been considerable advances towards inclusiveness, SMEs and their interests are still underrepresented in the European Standardisation System. This issue is especially prominent in the case of some European Standards Organisations. ETSI is based on a direct membership model that together with its voting system leads to a decision-making process where SMEs and other weaker stakeholders are at a disadvantage. Around 25% of ETSI members are SMEs. Nevertheless, the votes of all the SMEs combined are just equal to the votes of the three biggest member companies by number of votes. These companies also happen to be non-European.

The amendment proposed tries to address this issue by requiring a certain decision-making power of National Standards Bodies (NSBs) on the ESOs' decisions affecting standardisation work requested by the European Commission in support of European legislation and policies. Although this measure may help to a certain extent to re-balance the representation of all stakeholders' interests, this should be combined with specific actions to support further participation of SMEs and other stakeholders at the national level, in addition to the European and international levels, as indicated in the European Standardisation Strategy.

Conclusion

Inclusiveness is a key principle of Regulation 1025/2012 and the European Standardisation system. SBS supports the Regulation and although we believe there is no need to have a complete revision, **we do support the objectives of the targeted amendment proposed by the Commission.**

We also believe there is a need for a more effective implementation of its provisions, in relation to articles 5 and 6 on stakeholder participation and access of SMEs to standards. Further facilitating and increasing SME participation at the national level is also essential to be able ensure a balanced representation at the European and International levels. It is for this reason that SBS would like to propose some additional wording to the amendment proposed by the European Commission:

Commission proposal	SBS proposal
2a. Each European standardisation organisation shall ensure that the following decisions concerning European standards and European standardisation deliverables referred to in paragraph 1 are taken exclusively by representatives of the national standardisation bodies within the competent decision-making body of that organisation: [...]	2a. Each European standardisation organisation shall ensure that the following decisions concerning European standards and European standardisation deliverables referred to in paragraph 1 are taken exclusively by representatives of the national standardisation bodies -after consultation and consensus building with all national stakeholders- within the competent decision-making body of that organization: [...]

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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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