

Securing Europe's Competitive Edge on the International Market

Registration number in the register
of interest representatives: 9765362691-45

December 2025



VDMA Contributions to the Revision of the Standardisation Regulation (EU) No. 1025/2012

VDMA strongly supports a revision of Regulation (EU) No. 1025/2012 to address recently highlighted issues and ensure that the European standardisation system remains efficient, inclusive, and internationally aligned. Our contributions to the Call for Evidence presented a brief overview about the modifications needed. This paper forms part of a series in which we express in more detail our ideas, solutions, initiatives and demands to support our European strategic orientation by improving the pillars for the presumption of conformity within the New Legislative Framework (NLF).

Strengthening Europe's Global Leadership through Strategic Standardisation

With over 80% of goods exported from the European Union having their origin within the Internal Market, the economic strength of the European Union is fundamentally tied to its ability to act as a cohesive and harmonised trading bloc. This strength is underpinned by a robust framework of harmonised standards, which ensure consistency, safety, and quality across Member States. These standards not only facilitate seamless intra-European trade but also serve as a powerful tool for projecting European values and technical excellence globally. In an increasingly competitive and fragmented global landscape, the European Union must reaffirm its commitment to normative leadership through both harmonised standards and strategic deployment of non-harmonised standards. These instruments are essential for maintaining Europe's industrial competitiveness, safeguarding its innovation capacity, and promoting its ethical and environmental values worldwide. Care must be taken, however, not to jeopardise this impact by focussing too much on legal and formal instead of technical aspects in developing standards as this unnecessarily binds European experts' resources.

1. Avoiding Duplication and Ensuring Coherence

Europe faces a decline in expert availability, a reduction of travel budgets, and an increased risk of fragmentation in normative requirements. These threaten the consistency and efficiency of standardisation efforts, hence it impedes clarity and certainty for proper growth. Given that only around 20% of European machinery products remain within the Internal Market, aligning with international standards is increasingly vital. Identical or compatible requirements can prevent unnecessary, costly, and time-consuming product modifications, facilitating smoother access to global markets:

- A reaffirmation of the Vienna Agreement and Frankfurt Agreement is the preferred option. The European Union and the international standardisation bodies ISO and IEC should consider **embedding harmonised standards into the respective agreement** to transparently present responsibilities, rights and cooperation schemes. It is most beneficial to have a 1:1-endorsement of international standards in Europe, meaning that

Annex Z is the only difference between the harmonised European Standard and the international standard.

- Where the resulting European Standards are not available yet, alternatively to the endorsement of International Standards as European Standards (namely as EN ISO, EN IEC, EN ISO/IEC), it could be possible to **consider International Standards for the presumption of conformity directly** for a limited period of time. While this may not resolve current legal disputes between the European Commission and international standardisation bodies, it represents a pragmatic option for achieving conformity and preserving European safety and ethical values. Although this second option is less preferred, it allows further alternatives for having an accepted standard in place.
- This shall be accompanied by the **evaluation system** that objectively assesses the necessity and success prospects of European normative initiatives. Such a system would ensure that resources are allocated strategically and that duplication of work is avoided, preserving the coherence and credibility of the European standardisation landscape. Based on this evaluation system, another result could lead towards establishing a homegrown European Standard instead of endorsing international standards.
- A **systematic assessment** of the suitability of international standards for European use is therefore essential.
- Standardisation depends on the voluntary engagement of highly qualified experts, whose participation often comes at the expense of their companies' operational productivity. Without adequate support, this model is at risk of becoming unsustainable and weakens the quality and legitimacy of national representation in European and international standardisation processes. To counteract the negative developments such as the decline in expert availability and reduction of travel budgets, the establishment and **adequate resourcing of a Delegation Fund** is essential. Such a fund should be designed to support the participation of European experts, particularly from underrepresented sectors such as SMEs, consumer organisations, and academia, in key international standardisation activities. This would help ensure that European perspectives are effectively represented and that Europe remains a shaping force in the global standardisation ecosystem.

2. European Standards as Global Benchmarks

Historically, European Standards are not merely technical specifications, they have been instruments of trust, safety, and ethical governance. In absence of international standards, there is a third option which could be an alternative to demonstrate global relevance and reliability:

- As **emerging markets** seek stability and growth, European Standards can serve as normative stepping stones, offering a path toward sustainable development. They embody a level of safety, integrity, and environmental responsibility that protects both human health and the planet.

- **Regions lacking standards** might be unable to develop standards on their own or seek for efficiency by using existing requirements as template. Using European Standards as a guiding light, those regions would benefit from requirements devoid of unnecessary effort, expenses and uncertainty. An example for such an efficient approach is Australia, where European Standards on playground equipment and on cranes have been nationally implemented.
- Adoption of European Standards in regions of the world must be supported by specifically naming them in **international trading agreements**.
- These values must be promoted not from a position of superiority, but with **inclusive leadership and a commitment** to shared progress.

3. Elevating European National Standardisation Bodies on the Global Stage

European National Standardisation Bodies (NSBs) and National Committees (NCs) such as DIN and DKE in Germany are vital actors in shaping international standards with European leadership. Strengthening these institutions will enhance Europe's ability to shape the global standardisation agenda:

- NSBs' and NCs' expertise and credibility must be leveraged to **influence international strategies in Europe's favour**. Within the standardisation community these bodies form new collaborations supporting intergovernmental negotiations and relations for the European Union globally.
- Their **active participation in intergovernmental negotiations** and technical committees can foster new alliances and increase the likelihood that non-European countries support European-led initiatives.
- The European Commission should enable this by **granting access to political delegations and providing financial** support for international engagement.

4. Empowering Key Industries for Emerging Markets

The machinery sector is a cornerstone of the European economy, contributing over 12 % to the Gross Domestic Product of the European Union (EU-GDP) and ranking among the top four industrial sectors. European machinery is indispensable for global manufacturing, serving as the backbone of manufacturing of all kinds of products across all continents. A perspective beyond the standardisation system is relevant for maintaining the competitive edge of European industry:

- Tariff competition and shifting geopolitical dynamics are disrupting established trade relationships and call for **renewed cooperation frameworks**. To safeguard Europe's industrial leadership, the European Union must give priority to the machinery sector in its future trade and innovation policies – and including their renewal(s) – with evolving countries for emerging markets.
- Assessing **industries' impact to European defence capability**, the European Union should promote European machinery as a global benchmark for quality and safety.

- Furthermore, this promotion would have a ripple effect on various industries and sectors supporting **strategic alliances** that reinforce Europe's export strength and employment base.

Conclusion

To secure Europe's industrial leadership and global influence, a coherent strategy that empowers key industries, elevates European standards as benchmarks of trust and sustainability, and strengthens the role of standardisation bodies in Europe on the international stage is imperative. Avoiding duplication, supporting expert participation, and reaffirming collaborative agreements will be critical to maintaining coherence and credibility. By fostering inclusive partnerships, embedding European values in global frameworks, and ensuring alignment with international standards, the European Union can safeguard competitiveness while promoting ethical and environmental integrity. Ultimately, Europe must lead not through imposition, but through innovation, reliability, and a commitment to shared progress. It is important to note that current mandatory processes originating from the legal framework severely impede the international competitiveness of Europe through binding scarce resources and iterating discussions.

About VDMA

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Lobbying Register: R000802

EU-Transparency Register ID: 9765362691-45

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Creating Market Acceptance for Common Specifications

VDMA Contributions to the Revision of the Standardisation Regulation (EU) No. 1025/2012

VDMA strongly supports a revision of Regulation (EU) No. 1025/2012 to address recently highlighted issues and ensure that the European standardisation system remains efficient, inclusive, and internationally aligned. Our contributions to the Call for Evidence presented a brief overview about the modifications needed. This paper forms part of a series in which we elaborate our creative ideas, solutions, initiatives and demands to support our European strategic orientation by improving the column for the presumption of conformity within the New Legislative Framework (NLF).

Furthermore, it has also contributed to the part for Common Specifications on both recent Omnibus IV proposals “Omnibus Directive Aligning product legislation with the digital age”, namely COM(2025)503 and COM(2025)504.

Ownership, Transparency and Defined Process are Key for High-Value Application of Common Specifications for Presumption of Conformity

In light of the increasing European Commission’s intention to use Common Specifications (CS) as a regulatory fallback mechanism to harmonised European Standards (hEN) within the European Single Market, and their embedding in both new and revised legal acts, it is imperative to establish a robust, transparent, and participatory framework for their development, adoption and withdrawal.

Their intention for supporting presumption of conformity with respective European legislation – similar to harmonised European Standards bracing the NLF – is vital for a liberal, performant, competitive and successful European market. VDMA understands Common Specification as a tool for trust in safe and conformant products instead of expensive, time-consuming, and impeding third-party certification and conformity assessments.

This paper outlines key recommendations to the European Commission regarding the prerequisites, governance and procedural integrity of Common Specifications.

1. Prerequisites for Initiating Common Specifications

The framework, conditions and justifications when and how the European Commission is planning to use a complement to harmonised European Standards, namely Common Specifications, has become inconsistent, vague and intransparent by moving away from the wording used in existing legislation such as the Machinery Regulation (EU)2023/1230, Article 20 – a development we see with strongest concerns. Common Specifications shall only be initiated under clearly defined and demonstrable conditions which must be publically documented and announced (e.g. via the “Have Your Say” platform) to ensure transparency and stakeholder awareness:

- A **Standardisation Request (SReq)** shall be issued in advance to any activities for requirements specifications in regards to European legislation. Addressing any acknowledged European Standardisation Organisation (ESO) first will proof the concept of Common Specification being the fallback-option in case of lacking harmonised European Standards, hence the European Commission’s consideration to rely on Common Specifications. This will strengthen the NLF concept by allowing the established standardisation system to react and prepare properly for intended requirements and relations to European legislation. Further, this provides transparency and forms trust in the European Commission’s work and industry treatment.
- The first option when Common Specifications can be considered is in case this **Standardisation Request has been rejected or not accepted** by any European Standardisation Organisation. It will be relevant to make the reasons for the absence of a valid and an accepted Standardisation Request publically available by the European Commission.
- The second option when Common Specifications can be considered is in case of **undue delays in the development of a harmonised European Standards**. The demand for proof could be fulfilled by making the Standardisation Work Plan of the respective European Standardisation Organisation available to the public. It is essential that the European Commission and the relevant European Standardisation Organisation agree on realistic, competition-oriented, and market-friendly timelines for the development of harmonised European Standards within the framework of the Standardisation Request.
- The third option when Common Specifications can be considered is in case the **resulting harmonised European Standard fails to meet the essential requirements of the relevant legislation**, whereby two further uncertainties occur, namely who will make this consideration and whether negative HAS Assessments also fall under this aspect. Following this negative consideration, the European Commission shall make the reasons and assessment results publically available to engage corrections and revisions of the relevant harmonised European Standard to reach the intended adequacy for the respective European legislation.

- The fourth option when Common Specifications can be considered is in case of the **resulting harmonised European Standard does not comply with the Standardisation Request**, whereby, again, two further uncertainties occur, namely who will make this consideration and whether negative HAS Assessments also fall under this aspect. Following this negative consideration, the European Commission shall make the reasons and assessment results publically available to engage corrections and revisions of the relevant harmonised European Standard to reach the intended adequacy for the respective European legislation.
- The fifth option when Common Specifications can be considered is in case **no reference to a relevant harmonised European Standard has been published in the Official Journal of the European Union (OJEU)** and will not be realised within a timeframe of nine months after the harmonised European Standard has been offered for citation by the relevant European Standardisation Organisation. Since this formal step solely lies in the European Commission's responsibility, the burden of proof rests with the European Commission.

2. Process Ownership

The current wording neither in legislation such as the Machinery Regulation (EU)2023/1230, nor the Omnibus IV proposal (COM(2025)503 and COM(2025)504 respectively) answer the question about an entity taking ownership and responsibility for Common Specifications. For building trust in and fostering acceptance of Common Specifications by the industry, however, the drafting and oversight of Common Specifications must be entrusted to a clearly designated process owner ensuring all parties involved in formulating the requirements to meet on equal terms, without advantage to a certain party:

- Such an entity shall **not have power** to influence, formulate and develop specifications and requirements, nor direct decision-making in favour of one party, nor pursue its own interest.
- Its **responsibilities shall be limited to**: criteria validation, drafting and managing Standardisation Requests, overseeing Common Specifications development, reviewing existing Common Specifications, and assessing existing requirements documents for their suitability.
- Such an entity shall be integrated within the European Commission. Any **external outsourcing to private entities shall be prohibited** to preserve institutional integrity and public accountability.

3. Transparency and Broad Involvement

As outlined in the above, the current framework for Common Specifications is lacking transparency. This, however, states another pillar for trust in and acceptance of Common Specification, and must be embedded throughout the Common Specifications lifecycle:

- All Common Specifications drafts, whether developed by the European Commission under the umbrella of the assigned entity or proposed by external organisations, must undergo an official **public consultation** via the “Have your say” platform.
- Considering the continuous status of Common Specifications being Implementing Acts, a minimum of **four weeks prior to the committee voting** (see (EU) No. 182/2011, Article 5) shall be reserved for stakeholder feedback, including civil society and industry.
- The **Better Regulation Toolbox** should be applied consistently to ensure procedural clarity and democratic legitimacy.

4. Drafting and Approving Common Specifications

It remains unclear where Common Specifications are drafted, who is involved in setting the specific requirements and how their approval is agreed upon, leading to a stronger distrust in Common Specifications. A transparent composition and representation should be provided:

- The drafting of Common Specifications must be entrusted to a **dedicated drafting committee**, under the umbrella of the process owner, consisting of experts representing different stakeholder groups and interests.
- **Criteria for the qualifications of the experts** participating in the drafting committee shall be defined and communicated. This will further result in appropriate requirements in regards to both their correctness and suitability.
- The relevant drafting committee could have **restricted access to limit variety and number of stakeholders to allow for fast-track development**, consequently serving as short-term interim supplement for harmonised European Standard. Such a limitation could for example allow the European Commission and its relevant Directorate(s) General together with industry representatives to draft Common Specifications.
- Proper establishment of an impactful drafting committee would require the European Commission to **forgo the use of its Expert Groups**. Those are rather initiated for consulting the European Commission in questions and discussions in strategic matters as well as application of European legislative acts and their protection measures; their composition is independent from the relevant markets and industries which would lead to mistrust in the requirements and a lack of acceptance for Common Specifications.
- This drafting committee must operate under principles of **collaborative drafting**, with clear documentation of participation and decision-making processes. It should be possible to renounce from consensus when drafting Common Specifications to achieve their purpose of reflecting the state-of-the-art.
- The final adoption must follow the **Examination Procedure** under Regulation (EU) No 182/2011, Article 5, ensuring Member State involvement.

5. Adoption of Existing Documents

It might be possible that already existing requirements documents which have gained market acceptance, relevance and wide application are considered feasible and may serve as the basis for Common Specifications. This approach will foster efficiency by allowing for high-quality requirements in the least time possible, while maintaining regulatory rigour:

- A formal **criteria check** (e.g. state-of-the-art, coherence, scope) is necessary to assess their suitability for presumption of conformity, ensure alignment with essential requirements and enhance chances for the application.
- It needs **transparency in origin and authorship** of the requirements document in question. The drafting and/or publishing organisation shall also fulfil strict criteria for expressing stakeholder involvement, openness and fairness.
- In order to make adopted documents publically available as Common Specifications, a commitment to open access post-adoption in form of a **copyright waiver** should accompany the proposal.
- The final adoption must follow the **Examination Procedure** under Regulation (EU) No 182/2011, Article 5, ensuring Member State involvement.

6. Withdrawal and Transition

Common Specifications cannot be considered a permanent solution. Instead, the target shall always be the development of a harmonised European Standard superseding the respective Common Specification. Consequently, its withdrawal must be governed by clear, consistent and practicable rules:

- A Common Specification shall be **repealed when the reference of a suitable harmonised European Standard is cited** in the Official Journal of the European Union.
- A **transition period** during which both the repealed Common Specification and the harmonised European Standard give presumption of conformity in parallel must be granted to allow for adequate market adaptation. This period shall be individual depending on the sector, industry, product etc. and should be agreed upon in the preceding Standardisation Request.
- The withdrawal procedure must follow the **Examination Procedure** under Regulation (EU) No 182/2011, Article 5, ensuring Member State involvement.

Conclusion

The establishment of Common Specifications must not compromise the integrity, transparency, or inclusiveness of the European Standardisation System. By implementing the above recommendations, the European Commission can ensure that Common Specifications serve as a reliable and legitimate complement defined as a fallback option and interim supplement to harmonised European Standards, reinforcing the Single Market and safeguarding public trust.

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Connecting Consortia and Fora to the European Standardisation System

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Achieving Synergies Between Standards Setting Organisations of all Kind to Increase a Levelled Stakeholder Involvement

In the evolving landscape of European governance, the role of standardisation has become pivotal in ensuring legal clarity, technological interoperability, and democratic accountability. This document specifically focuses on two aspects – interconnecting consortia, fora and SMEs further with standardisation committees, as well as, making any kind of technical rules by consortia, fora and other organisations usable for standardisation activities. The European Union must reinforce its commitment to transparency, inclusivity, and legal certainty in order to safeguard the integrity of its internal market and to maintain its global leadership in standard-setting. The proposals outlined in this paper seek to modernise the European standardisation framework in a manner that is pragmatic while founded on stable principles.

1. Consultation of European Standardisation Committees

The involvement of consortia and fora could significantly influence consensus-building and effect the technical depth of requirements. Positively, their structured integration into the European standardisation process should be actively supported. This approach needs guidance through defined principles.

- Consortia must retain full **autonomy over the requirements they choose to contribute** to the standardisation process. Their voluntary engagement should be respected as a strategic decision, and no obligation should be imposed to disclose proprietary or developmental content beyond what they deem appropriate.
- The **voluntary adoption of such requirements** by European standardisation committees must be conducted with due regard for the original intent, scope, and context defined by the contributing organisations. This includes preserving the technical coherence and purpose of the material, and avoiding distortions that could undermine its applicability or integrity.

2. Promotion of Liaisons Between European Standardisation and External Bodies

Effective collaboration across institutional and organisational boundaries is essential for a coherent and future-oriented standardisation system. Both formal and informal liaisons between European Standardisation Organisations and external actors such as consortia, fora, SME representatives, SME groups, and international bodies already exist. This collaboration should actively be promoted and supported. A bidirectional cooperation, understanding and commitment is relevant for promoting fruitful liaisons.

- Mutual understanding, technical alignment, and regulatory compatibility must be strengthened through **structured dialogue and regular interaction**. Such engagement fosters a shared vocabulary, reduces fragmentation, and ensures that standards are developed with a common purpose in mind.
- Mechanisms for knowledge exchange should be established and maintained to facilitate the **transfer of expertise, best practices, and technical insights**. This not only enhances the quality of standards but also reduces duplication of effort, enabling more efficient use of resources and faster time-to-market for innovative solutions.
- A new level of cooperations could be reached by establishing formal channels for dialogue, **joint standard-setting initiatives, and mutual recognition of technical contributions**¹. This will ensure that global innovation ecosystems are effectively integrated into the European standardisation framework.

3. Relinquishment of restrictive Copyright and Intellectual Property

In the context of European legislation and if intended by the copyright owner to serve for the presumption of conformity, any document containing technical requirements (consortium standards and de-facto standards) are made freely accessible and are not subject to restrictive intellectual property claims. Yet, a differentiation is necessary for proper and adequate application and consideration.

- All documents referenced in European law must be made **publicly accessible** without restriction. This is essential to ensure that individuals, organisations, and public authorities can consult and apply the law in a transparent and equitable manner.
- Requirements developed by consortia and standardisation fora, particularly when intended for regulatory use, must be made **available for free and unrestricted use**. This includes the removal of restrictive licensing conditions or intellectual property constraints that could impede their implementation or limit their utility in practice.
- In certain cases, to implement technical requirements, it might be necessary to practise existing patents or to implement a patented invention. Under these circumstances, those **patents shall be accessed under FRAND**² terms to ensure fair, reasonable, and non-discriminatory licensing.

¹ A best practice example for this recognition is the so called "JTC 1 PAS Transposition Process" (aka "PAS Submitter Process") by ISO/IEC JTC 1, see [ISO/IEC Directives, Part 1 – Consolidated JTC 1 Supplement 2024](#), F.3.

² The FRAND model describing fair, reasonable, and non-discriminatory terms goes beyond the existing rules in the standardisation landscape for this. [ISO/IEC Directives – Part 1:2024](#), 2.14, only consider RAND conditions, hence, this inconsistency should be corrected and aligned during the next update.

- The European Union should provide **legal certainty about the status of any standardisation document** in light of the interpretative jurisprudence of the European Court of Justice regarding European Standards. This includes explaining how the citation of the reference of a harmonised European Standard in the Official Journal of the European Union (OJEU) constitutes that this standard is an integral part of EU law and, as such, must be accessible to all stakeholders without legal or financial barriers.

4. Extension of Annex III Organisations

A balanced and inclusive standardisation system is essential for the legitimacy, effectiveness, and societal relevance of European standards. To widen the access points and interfaces for diverse stakeholders, the scope and role of Annex III organisations, as defined in Regulation (EU) No. 1025/2012, should be reconsidered, expanded and reinforced.

- Cooperation between European Standardisation Organisations (ESOs) and global consortia and fora must be **transparent to the public**. This relates to the channels for dialogue, joint standard-setting initiatives, and mutual recognition of technical contributions³ that we proposed as part of Liaisons.
- Annex III organisations must be granted **explicit opportunities to participate in standardisation processes**. This entails not only formal inclusion but also the provision of adequate resources, capacity-building support, and procedural safeguards to ensure that their views are considered alongside other stakeholders.
- Transparency must be ensured for all stakeholders involved in the standardisation process. This requires the publication of **clear and accessible information regarding the purpose, governance structures, operational models, and declared interests of the consortia and fora** contributing to standard development. Such transparency is vital to foster trust, accountability, and informed participation.
- The **principle of national delegation**, as enshrined in the European Standardisation System, must be preserved and respected. It is imperative to prevent any undue advantage being conferred upon specific organisations or Member States. Furthermore, mechanisms should be established to monitor and limit the influence of third-country actors in European standardisation processes, thereby safeguarding the strategic autonomy and integrity of the Union's internal market.

³ A best practice example for this recognition is the so called "JTC 1 PAS Transposition Process" (aka "PAS Submitter Process") by ISO/IEC JTC 1, see [ISO/IEC Directives, Part 1 – Consolidated JTC 1 Supplement 2024](#), F.3.

5. References to External Requirement Documents in European Standards

Legal certainty about standards and technical consistency are fundamental to the credibility and effectiveness of European standardisation. Hence, a coherent and transparent referencing framework must be established and maintained. This framework should be guided to allow meaningful consideration of requirements beyond the European Standardisation System.

- In cases where requirements are directly and first-hand referenced in connection with European Union legislation, **any associated restrictive copyright and intellectual property rights must be relinquished**. This is essential to ensure that such references do not create legal uncertainty or restrict access to documents relevant for fulfilling the law.
- Where requirements are not directly linked to European legislation, **references to such documents should remain permissible**. This flexibility allows for the integration of innovative or sector-specific content, provided that it does not compromise the legal clarity or accessibility of the standardisation framework.
- **Access to all referenced documents must be guaranteed by either the European Standardisation Organisations or the contributing consortia and fora**. This ensures that all stakeholders, including regulators, industry, and civil society, can consult the relevant materials without undue barriers.
- The complexity of the standardisation landscape must be reduced through the **harmonisation, alignment, and simplification of requirement documents**. This includes the consolidation of overlapping specifications and the promotion of integrable frameworks that facilitate implementation across sectors and Member States.
- Maintaining **coherence across the European Standardisation System** remains a critical and ongoing challenge. It is therefore necessary to establish mechanisms and usage of modern IT tools for coordination, oversight, and continuous improvement to ensure that the system evolves in a consistent and strategically aligned manner.

6. Open Source Standards

Open source development models could offer valuable contributions to the creation of standards and specifying requirements. Their integration into the European standardisation framework should be encouraged. However, the provision that appropriate safeguards are in place to ensure legal certainty and technical reliability is crucial.

- The **suitability of open source outputs** for legislative application must be rigorously assessed. This includes evaluating the maturity, stability, and consensus basis of the proposed requirements, as well as their alignment with the principles and objectives of European standardisation.
- The **stability of requirements** must be guaranteed following their adoption as references within European standards or as Common Specifications. It is essential to prevent any subsequent modifications, particularly those made unilaterally or without due process, that could compromise the legal certainty of the specifications or undermine the presumption of conformity under European Union law.

Conclusion

A resilient and future-oriented European Standardisation System must be grounded in openness, legal certainty, and inclusive governance. The recommendations presented in this document advocate for the removal of intellectual property barriers, the empowerment of so-called Annex III organisations, and the structured integration of open source and international standards. By fostering transparency, enhancing stakeholder engagement, and ensuring coherence across regulatory instruments, Europe can strengthen its strategic autonomy and uphold its normative influence on the global stage. Only through such a comprehensive and forward-looking approach can standardisation continue to serve as a cornerstone of Europe's regulatory and innovation agenda.

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Paving the Way for Tomorrow's Harmonised Standards Assessment (HAS) System

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Enhancing Efficiency and Transparency through Reform of HAS Assessments

The European Union's internal market benefits tremendously from the concept of harmonised European Standards and the accompanying presumption of conformity. This concept has proven highly successful in ensuring legal certainty, product compliance, cost efficiency, time efficiency as well as cross-border interoperability when placing products on the market. The principle of harmonised European Standards are essential for enabling innovation, supporting industrial competitiveness, and facilitating the free movement of goods. However, the current system of HAS Assessments, on which the European Commission largely relies for determining whether a harmonised European Standard meets the requirements of European legislation has become a major source of delay and uncertainty in the drafting process of harmonised European Standards.

Experts and technical committees frequently complete their work without knowing whether the resulting harmonised European Standard will ultimately be deemed suitable for citation in the Official Journal of the European Union, which is the condition for achieving presumption of conformity. This uncertainty is particularly troublesome in the machinery industry which alone accounts for approximately 800 harmonised European Standards. Tasked with reviewing an extraordinarily broad and technically diverse portfolio, currently about 13 HAS Consultants of whom around ten specialise in machinery products and three in noise requirements are assigned to this high number of standards. Such a disproportionate burden strains the assessment process and undermines planning certainty for manufacturers. The enormous delays and the mentioned uncertainty weaken the strategic value of European standardisation. To restore trust and efficiency in the concept of harmonised standards, the HAS Assessment process must be reformed to become more transparent and aligned with the realities of industrial development.

1. Earlier Involvement of HAS Consultants in the Drafting Process

The most relevant in-depth HAS Assessment is currently conducted after the drafting process is completed, often resulting in unnecessary iterations within the standardisation committees, unintended revisions of standards, rejections of standards as well as avoidance of revisions to not lose the presumption of conformity. While the decision on citation ultimately remains with the European Commission, the European Commission strongly relies on the results of the HAS Assessments – a negative assessment almost certainly leading to a subsequent rejection by the European Commission. To improve this situation, VDMA believes that the assessment process needs to be significantly streamlined and become more predictable.

- HAS Consultants should already be **involved during the drafting stage** (Stage Code 20.60), particularly before the Enquiry phase. This would allow sufficient time for committees and consultants to reach consensus on necessary adjustments, resulting in earlier alignment with the HAS Consultant already before the public consultation.
- The **second and final HAS Assessment should be conducted immediately after modifying the draft** resulting from Enquiry comments, before the submission to the Formal Vote stage (before Stage Code 45.99), allowing for low threshold changes without delaying the subsequent publication by the relevant European Standardisation Organisation.
- Most importantly, **early informative involvement in the standardisation activities would eliminate the uncertainty surrounding the “pass/fail” outcome**, avoid market confusion about the state-of-the-art, eliminate gaps caused by outdated or missing standards, and would prevent deterioration of the quality and credibility of standardisation work.

2. First-Hand Communication and Dialogues between HAS Consultants and Standardisation Committees

HAS Assessments are conducted second-hand without direct communication and representation of comments to technical committees. In addition, the responsibilities and the role of a HAS Consultant are not clear to all parties involved. In international committees, in particular, there is a great extent of confusion as to why a single voice carries so much weight. In Europe, too, anonymity causes irritation among experts and, in some cases, a feeling of being patronised and undermined in terms of their own abilities and expertise. This can lead to the HAS Consultant being (unintentionally) perceived critically, which in turn often has a negative impact on communication.

- The direct involvement of HAS Consultants would help prevent the emergence of stand-alone opinions by individual consultants, which contradict the principles of fair and transparent standard-setting. A **collaborative approach would strengthen the legitimacy of the process** and improve outcomes for all stakeholders.
- Relying solely on written comments without further clarification during meetings often leads to misinterpretation, procedural inefficiencies, unnecessary iterations, and

frustration on either side. If the HAS Consultant participates in a meeting **clarifying their comments at an advanced stage and at the request of the relevant committee**, it would enable them to contribute meaningfully to the drafting process and foster consensus from the outset.

- This form of direct involvement, in addition to the relevant written commenting, would **reduce post-drafting objections and prevent conflicts** between committees and consultants.
- It would also **decrease the likelihood of standards being decoupled from Standardisation Requests**. This decoupling is a workaround which is observable more frequently to allow publication despite HAS Consultants considering harmonised European Standards non-compliant.
- Annex Z is seen the most relevant cause for rejections by HAS Assessments when drafting harmonised European Standards. While most technical experts are familiar with products, systems and services, they often feel unable to draft the Annex Z correctly and as necessary in terms of legal aspects. HAS Consultants are well-positioned to **guide committees in drafting Annex Z correctly**, by explaining its legal relevance and intent, by offering practical insights into its formulation, and by explaining why it should be written by experts with in-depth technical knowledge. Their contributions carry institutional authority and could complement the role of the committee secretary.

3. Strengthening Transparency and Appropriateness for the HAS Assessment Process

To uphold the integrity of the European Single Market and the New Legislative Framework, it is imperative that the HAS Assessment process is transparent, constitutes a sound basis for targeted and effective modifications of the draft standard's text, and is applied in a consistent manner. However, standardisation committees experience numerous misunderstandings and report about significant confusion with HAS Comments and modifications that are requested to achieve positive HAS Assessments.

- To enhance the credibility and effectiveness of the HAS Assessment process, it is essential to ensure a **consistent level of detail in consultants' feedback, accompanied by specific clarity about the requested changes**. In the absence of adequate clarification, there remains a significant risk that comments will be insufficiently addressed, leaving the harmonised European Standard unchanged and the negative HAS Assessment unresolved.
- During the Formal Vote Assessment, it must be assured that HAS Consultants only assess those text passages that have been newly introduced resulting from the Enquiry stage or from proposed solutions to comments during the previous HAS Assessment. **Text passages, which had already been presented at the time of the Enquiry assessment and remained uncommented, shall be disregarded** at later HAS Assessments.

- Likewise, it needs to be clear to all HAS Consultants that the **Last Confirmatory Assessment (LCA) may only address issues that were identified as non-compliant during the Formal Vote Assessment** and were, as a consequence, addressed by the relevant standardisation committee. It should not be allowed to add new aspects at this late stage.

4. Unified Application of HAS Assessments and Consultants' Involvement in a Prioritised Order

Currently, HAS Assessments are individually required by the European Commission's Directorates General. They are commonly used for most legislative areas but not for all, such as the AI Act and the Data Act, which is creating inconsistency, imbalance and unpredictability.

- A **unified approach is needed throughout all NLF legislations**. This principle should be upheld, regardless of whether an assessment is carried out by a HAS Consultant or any other designated body or entity.
- More agile areas and sectors within a dynamic environment need HAS Assessments leading to faster standards' publications and subsequent citation of their references in the Official Journal of the European Union. This entails **clear prioritisation of key sectors and industries within an individual European legislative act** for the order of HAS Assessments. This prioritisation must be transparent to all stakeholders to ensure planning reliability and strategic alignment across the European standardisation landscape.
- The European Commission and its Directorates General would benefit from this **consistency within the HAS system**. Assessment results will be available on time depending on the prioritisation, and trustworthy and accountable due to the transparent involvement.

5. Disclosure and Qualification of HAS Consultants

The current system prohibits direct communication with or even identification of HAS Consultants, resulting in distrust, lack of communication, loss of information and assessments independent from the actual product or matter.

- To improve cooperation and trust, the relevant field, sector, or industry expertise of each **HAS Consultant should be disclosed and evaluated**. It goes beyond a general knowledge of products towards expertise for product types and product groups concerned.
- Their **acceptance and credibility within the respective technical community** and sector should be assessed. Cooperative and positive relations would support the constructive cooperation and the tailoring of efficient communication accordingly.
- Mechanical engineering is a very broad field and HAS Consultants cannot be expected to claim having specialist global expertise in all areas – nor do they necessarily need to. They have a comprehensive understanding and knowledge of the regulatory field and of

the interpretation and application of the relevant regulations. Experts in standardisation committees, on the other hand, are specialists in their respective technologies. Both worlds should be brought together; the experts should benefit from the specialised knowledge of the HAS Consultant, and the HAS Consultant should be given the opportunity to better understand the respective technology and, if necessary, to experience it in practice. This means that HAS Consultants should be given the **opportunity to visit a production site, view simulations, or study Digital Twins of representative products before the HAS Assessment** - or afterwards in case of a negative HAS Assessment to prepare the reassessment properly. Such an approach will certainly improve cooperation and acceptance significantly, which will be reflected in a higher number of positive assessments.

- **Consistency in the assignment of HAS Consultants** is essential to reach high-quality results. Assigning more than two HAS Consultants to the same standardisation committee and/or standardisation project have often lead to rediscussing identical aspects, contradictory assessments, and possible lack of effectiveness of defining valid technical requirements. If a change is unavoidable, the newly assigned HAS Consultant must be given access to the previous assessments and comments.

6. Alternatives to HAS Consultants

In cases where HAS Assessments prove inefficient or problematic, alternative mechanisms should be considered while taking into account the suggestions 1. to 5. stated above.

- The **entity drafting the Standardisation Request** could assess the suitability of content of the presented harmonised European Standards. Knowing the background and intentions of the details in Standardisation Requests, the same entity will be the most accountable for the expected vs. achieved outcome.
- **Market Surveillance Authorities** could provide input on conformity. This approach would require aligned understandings, consistent processes, working methods and entity entitlements throughout the European Union.
- **Desk Officers and Directorates General** within the European Commission should be encouraged to make use of their power for taking responsibility for decisions regarding presumption of conformity, restoring accountability and confidence in the system. This will further shift the weight to the European Commission instead of a private and/or individual entity.

Conclusion

The current HAS Assessment process is a critical bottleneck in European standardisation, undermining efficiency, transparency, and trust. By involving HAS Consultants earlier, integrating them into committee work, and reforming the assessment framework, the EU can restore planning certainty and strengthen its normative leadership including an acceleration of the standardisation process and an increase in positive HAS Assessments. A unified,

transparent, and accountable system will ensure that harmonised standards continue to serve as a cornerstone of the European Internal Market and a beacon of quality and safety worldwide. This imperative shall be firmly anchored in the revision of Regulation (EU) No. 1025/2012, preferably as an Annex for easy reference and, if needed, time-efficient adjustments. To uphold the spirit and intent of this regulation, it is essential that standardisation committees recognise and embrace the HAS Assessment process not as an external imposition, but as an integral part of the regulatory ecosystem. Greater acceptance and cooperation at the technical level will be key for ensuring that harmonised European Standards remain fit for purpose, legally sound, and globally respected.

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Standardisation Requests: Accelerating the Drafting and Aligning the Understanding

VDMA Contributions to the Revision of the Standardisation Regulation (EU) No. 1025/2012

VDMA strongly supports a revision of Regulation (EU) No. 1025/2012 to address recently highlighted issues and ensure that the European standardisation system remains efficient, inclusive, and internationally aligned. Our contributions to the Call for Evidence presented a brief overview about the modifications needed. This paper forms part of a series in which we express in more detail our ideas, solutions, initiatives and demands to support our European strategic orientation by improving the pillars for the presumption of conformity within the New Legislative Framework (NLF).

Alignment of Structuring and Governance of Standardisation Requests throughout the New Legislative Framework

In the New Legislative Framework (NLF), harmonised European Standards (hEN) are the preferred instrument for providing presumption of conformity with respect to European legislation. This in turn is vital for a liberal, competitive and successful European market. VDMA considers harmonised European Standards in combination with self-declaration as the primary tool for ensuring trust in safe and compliant products instead of undergoing expensive, time-consuming, and impeding third-party certification during conformity assessments with sometimes questionable added value.

This paper outlines key recommendations for the structuring, governance, and procedural integrity of Standardisation Requests. It draws upon the draft proposal and associated commentary and aims at proposing a coherent framework for the development of Standardisation Requests¹ (SReq, formerly Standardisation Mandates) that ensures transparency, inclusivity, and legal certainty, including a timely availability of the SReq. In light of the fact that the fallback-option of Common Specifications (CS) is increasingly becoming part of the NLF, they are interwoven with Standardisation Requests within this paper.

¹ Drafting and acceptance of Standardisation Requests takes an average of 1,2 years according to the EVALUATION of Regulation (EU) No 1025/2012 of the European Parliament and of the Council of 25 October 2012 on European standardisation – SWD(2025)170 ([web-link to document](#)).

1. Prerequisites

Standardisation Requests have efficiently served as the link between European legislation and standardisation for decades. They form a common basis between the European Commission and the European standardisation system, helping European industry to adapt to new legislative requirements and align with the state of the art regarding the presumption of conformity. It is essential to conserve this cornerstone of the European Single Market which constitutes the highest expression of trust in both the European Commission and the industry:

- A Standardisation Request shall always be the **basis for any standardisation activity which** supports European legislation. It allows European society, the European Commission and other legislators, industry, market surveillance authorities and service providers to have transparency and certainty on the presumption of conformity by providing deadlines, deliverables, technical detail linking to concerned European legislation(s) and possible alternatives.
- The **scope with the relevant paragraphs of European legislation** must be clearly delineated in each Standardisation Request, including product categories and technological domains. Such details will help standardisation committees to tackle the relevant aspects in the appropriate European legislation for a suitable coverage of the Essential Requirements (e.g. comparative analysis in Annex Z).
- Consultation activities that are carried out or are sub-contracted by the European Commission (e.g. via a Joint Research Centre) on predictable needs for future technologies and possible gaps in the current requirements landscape should be **market-oriented and be based on practical experience and concomitant feedback** from the concerned stakeholders. These activities should only be used to identify potential technical aspects and projected timelines as well as to consider research in the ideation process of potential content. This would help the European Commission to place their intentions and expectations in the Standardisation Requests on scientifically- and development-based insights. Such a market-oriented and yet innovation-supporting approach would yield a higher acceptance of Standardisation Requests.

2. Process Ownership for Drafting and Outcome Evaluation

Until today, the drafting of Standardisation Requests is – to some extent – not transparent with respect to the involved parties and the drafting committee. In addition, there have been complaints that the process appears to be inconsistent in duration and quality for different Directorates General, European legislation, standardisation committees, industry sectors, and topics. This lack of transparency and this individuality increase frustration among all parties involved, nurture distrust in the European standardisation system, and hinder the European industry's global market performance. Consequently, this process needs to be improved. An appropriate system could be set up as follows:

- A **horizontal entity** within the European Commission should unify the various workstreams and reduce complexity in the processes for Standardisation Requests. This

role would include convening stakeholders, managing timelines, ensuring procedural compliance, and evaluating intended results. Especially Standardisation Requests for European legislation concerning more than one Directorate General's responsibility would benefit from a neutral, equal, and fairly reviewed process. If no new entity is intended or established, the European Commission should more visibly embrace this coordinating function, ensuring alignment with legal frameworks and industry relevance.

- Such an entity shall **not have the power** to influence, formulate or develop specifications and requirements, nor direct decision-making in favour of one party, nor pursue its own interest. Its **responsibilities would be limited to**: criteria validation, drafting and managing Standardisation Requests, overseeing Common Specifications development, reviewing existing Common Specifications, and assessing existing requirements documents for their suitability.
- The drafting of each Standardisation Request would be conducted by an **inclusive drafting committee**, moderated and managed by the horizontal entity, comprising:
 - the Directorate(s) General affected by the legislation(s) and the corresponding SReq;
 - the Committee on Standards;
 - industry representatives;
 - each European Standardisation Organisation which is addressed, including concerned Technical Committees; and
 - relevant organisation listed under Annex III of Regulation (EU) No. 1025/2012, if the Standardisation Requests falls within their scope, work or aim.
- It would be beneficial that **evaluating the degree of fulfilment** of each Standardisation Request also lies with the aforementioned entity. This includes preparing the assessment with regard to the criteria whether the deadlines, technical depth and technical width agreed upon in the Standardisation Request are met or indeed surpass the expectations. Furthermore, this evaluation would be transparently, openly and neutrally presented to the responsible party having the decision-making responsibility. Another advantage lies with this approach in the possibility to replace the current complex HAS System which could have further beneficial effects such as cost-reduction and continuity as no external contractor would be involved.

3. Definition of Intended and Expected Deliverables

The statements made by the European Commission and some of the feedback submitted to the Call for Evidence on the revision of (EU) No. 1025/2012² convey the impression that an increasing variety of requirements documents could be under consideration and could be mistakenly interpreted for the use of the presumption of conformity. A clear commitment to the options – harmonised European Standard as the primary tool, Common Specifications as the fallback-option, and maybe something in between – and their essence are essential for clarity and predictability for all market stakeholders, especially for the trust in the European Commission's work and the procedures of market surveillance authorities:

- **Harmonised European Standards shall remain the first option**, preferred choice and ultimately targeted outcome of any activities of specifying requirements in deliverables intended for triggering the presumption of conformity.
- For keeping Europe's economic leadership on the global market and reducing the European industry's efforts in standardisation activities by unifying streams, any harmonised European Standard can **either be a "homegrown" European Standard or an endorsed International Standard** (ISO, IEC as EN ISO, EN IEC or EN ISO/IEC). With consideration of approximately 80% of machinery products manufactured within the European Union are exported, a difference made to either origin would constitute gross negligence as it puts an unnecessary burden to the European Single Market if only "homegrown" European Standards detached from global requirements give presumption of conformity.
- Over the past years, Standardisation Requests have begun to include other European Standardisation Deliverables in parallel to European Standards. This reflects the acknowledgement of possibly faster standards production within the European Standardisation System. Being recognised as "pre-standards", **Technical Specifications (CEN/TS, CLC/TS, CEN/CLC/TS) or the recently proposed European Agile Specifications (EAS) may be evaluated as a second option** for those requirements only in relation to a respective European legal act simply to meet deadlines agreed upon in the Standardisation Request. However, for such faster procedures, there are significant questions to be resolved for their practical implementation and suitable transition periods.
- According to the rules for standardisation, those deliverables are developed with the **prerequisite of being transformed into harmonised European Standards** in a future step. Hence, it is a general understanding to purposefully direct the subsequent activities towards developing a harmonised European Standard eventually.
- Any **European Standardisation Deliverables other than those mentioned above (hEN, and potentially TS or EAS) shall not be considered for supporting legal requirements**. Other forms of publication are of inappropriate value, unmeaningful

² See weblink on the 'Have your say' platform: [Standardisation Regulation – revision](#)

benefit or omit the relevant core principles of standardisation for any market acceptance and technical relevance.

- **Common Specifications are a fallback-option** which can only be used under restrictive conditions and – further – their utilisation must be justified. They need a clear integration within the Standardisation Requests to ensure transparency and to form trust. VDMA has submitted constructive proposals for the framework of Common Specification to the Omnibus IV proposals COM(2025)503³ and COM(2025)504⁴.
- When a Common Specification is considered or developed, a **harmonised European Standard shall always be the aspired permanent solution to replace that Common Specification**. Hence, all efforts shall be purposefully directed towards developing a harmonised European Standard.

4. Cross-Party Endorsed Timeframes

As a general statement, market developments have picked up in pace, and technology life cycles have shortened. This is, however, true only for some sectors, technologies and products while others are engineered for long-term operational lifespans and obsolescence trajectories. To tackle the threefold complexity of development speed vs. purpose of use vs. product lifecycle, transparently presenting expected availability of requirements documents is vital. In this regard, procedural refinements are necessary to enhance predictability and regulatory coherence:

- **A clearly defined drafting period of nine months** to the respective drafting committees until acceptance by the addressed European Standardisation Organisation shall be stipulated for the issuance of Standardisation Requests. This ensures procedural transparency and timely initiation, while at the same it allows for flexibly in updating Standardisation Requests to adapt technological developments and market needs.
- **Binding deadlines must be established for milestones** in the standards development process, i.e. the expected dates for the Enquiry phase, HAS Assessments and the resulting publication date of a harmonised European Standard. These dates are driven by open discussions and the necessary alignments of multilateral expectations considering the capabilities and resources of either stakeholder group and the associated product complexity, thereby safeguarding convergence with market and regulatory expectations.
- **Concerning the need for Common Specifications, temporal clarity is required** for their initiation, drafting and formal adoption to ensure legal certainty and operational continuity. Besides the technical aspects, Standardisation Requests should define the allowed and necessary time frames for the development of a Common Specification as a

³ See VDMA feedback to the proposal for an Omnibus Regulation “Aligning product legislation with the digital age” as COM(2025)503: [Feedback from: VDMA e.V.](#)

⁴ See VDMA feedback to the proposal for an Omnibus Regulation “Aligning product legislation with the digital age” as COM(2025)504: [Feedback from: VDMA e.V.](#)

fallback-option and interim deliverable to a harmonised European Standard. This definition shall be reasonably within the timeframe agreed for a harmonised European Standard.

- If available, **Common Specifications need a framework for repeal and transitional arrangements**. They should not expire automatically, but be repealed upon publication of a corresponding harmonised European Standard. To allow sufficient and at the same time proportionate adaption for the European industry and market to new requirements as well as their orderly implementation, care shall be taken to set individual sector- and/or product-specific transition periods to the subsequent harmonised European Standard, allowing varieties even within one Standardisation Request depending on their purpose and impact on the presumption of conformity.
- The **validity period of Standardisation Requests** must be extended for provisions for renewal or expiration, to avoid procedural ambiguity and ensure sustained relevance. Furthermore, it will support more targeted and focused discussions and negotiations for maintaining a Standardisation Request being fit-for-purpose including helping all relevant stakeholders to start off appropriately prepared for the continuing agreements.

5. Prescribed Technical Details Conductive to Market Performance and Innovation

The variety in European legislation, the European Commission's entities in charge, the standardisation committees addressed, and the variety of products concerned accumulate to a complexity which is almost unbearable for the European market and industry participating in setting requirements which support European legislation. Standardisation Requests are the connecting factor; hence, they are the tool for achieving simplicity, clarity and transparency for all parties' expectations regarding the technical aspects, too – not only the timely aspects. To ensure that technical expectations are equally well-structured and comprehensible, two dimensions must be explicitly addressed within Standardisation Requests:

- **Technical depth** – referring to the granularity and sophistication of the required technical solutions, safety mechanisms, and underlying technologies. This dimension ensures that the standards reflect the necessary level of engineering precision and sectorial relevance. While we acknowledge the European Commission's duty, we fear that technical restrictions, once they exceed a certain detailed level, will become counterproductive for a performant European Single Market, and an impediment for the international competitiveness of European industry and for innovative developments; too vague language will in contrary lead to uncertainty about expectations and intentions. A positive example of a sector-appropriate technical depth is the thematic approach in the Standardisation Request M/605 for the Machinery Regulation (EU) 1230/2023.
- **Technical breadth** – denoting the scope and number of legislative elements as well as product varieties and ranges to which the harmonised European Standards must respond. One of the biggest challenges would be the levelling of too broad perspectives

(cannot be fulfilled by standards setting) against a too narrow integration into the scope (lacking requirements for presumption of conformity).

6. Updates and Withdrawal

As instruments that translate legislative intent into technical implementation, Standardisation Requests must be designed with clarity and coherence at the outset as well as with mechanisms that allow for measured adaptability over time. This requires a balance between procedural stability and the capacity to respond to unforeseen developments without compromising legal certainty for stakeholders. To ensure that Standardisation Requests remain a reliable and policy-aligned instrument throughout their lifecycle, procedural principles and frameworks need to be operationalised:

- That European legislation allows for time periods between entering into force and their requirements becoming mandatory could also be a blueprint to make preparation periods possible for standardisation committees. Especially European legislation which is newly drafted and entering into force leads to significant motion on the European market. Defining rough elements from legislation proposals in form of **policy-based Standardisation Requests** will shorten the overall standards development time by providing the essential expectations and allowing for a head-start in defining requirements documents. This policy-based Standardisation Request shall be advanced to a “regular” Standardisation Request once the new European legislation enters into force.
- The **validity period of a Standardisation Request** must be explicitly stated, with provisions for targeted updates to accommodate unforeseen developments during the drafting of harmonised European Standards. At the same time, this will improve the adaptive capacity for the industry concerning costs, time and technical aspects. When approaching the validity date and considering the defined drafting period, the drafting of a successor Standardisation Request should commence at least one year prior to the agreed expiry date, allowing for seamless transition and uninterrupted regulatory coverage.
- **Updates to elements of an existing Standardisation Request**, e.g. deadlines and work programme, should be possible following a simplified amendment process. However, all unaffected elements should remain unchanged to preserve clarity and legal certainty for market actors.
- **Major revisions of Standardisation Requests trigger re-drafting**, in particular where substantial changes are required, a new drafting process initiated, ensuring procedural integrity and transparency. In this case, the existing Standardisation Request should be formally withdrawn.

Conclusion

To ensure the continued relevance and effectiveness of Standardisation Requests (SReqs) within the European regulatory framework, VDMA advocates for a policy-driven, transparent, and technically coherent approach. Standardisation Requests must be rooted in legislative intent, structured through inclusive drafting processes, and governed by clearly defined validity periods and update mechanisms. Harmonised European Standards should remain the primary instrument for presumption of conformity. In certain cases, Technical Specifications and European Agile Specifications might be evaluated as the secondary instrument. Common Specifications should be reserved for exceptional fallback scenarios. Technical depth and breadth must be explicitly addressed to ensure sectoral applicability and innovation support. Furthermore, binding timeframes for drafting, adoption, and repeal are essential to enhance predictability, reduce complexity, and foster trust among stakeholders across the European Single Market.

About VDMA

VDMA represents more than 3'600 German and European companies in the mechanical and plant engineering sector, making it the most significant industrial association in Europe. As an umbrella organisation comprising 36 specialised associations, VDMA covers the entire value chain of the capital goods industry – from individual components to complete systems, from system suppliers to service providers, and from interconnected machinery to self-organising logistics.

VDMA funds and staffs the Mechanical Engineering Standards Committee (NAM) within DIN German Institute for Standardisation, which was established on 11 March 1949. NAM is responsible for national, European, and international standardisation activities in the field of mechanical engineering. Similarly, the DIN Standards Committee for Machine Tools (NWM), which closely cooperates with NAM, is also affiliated with VDMA. In the 2024 business year, NAM managed 14 CEN/TC secretariats as well as 17 ISO/TC and ISO/SC secretariats respectively. Currently, 3'029 experts from 1'725 companies are actively involved in 329 different committees. Over more than 70 years, the close organisational integration of NAM within VDMA and its specialised associations has proven to be a guarantee for high-quality standardisation work. Moreover, NAM plays a vital role in promoting European interests in international standardisation and contributes significantly to the global market success of the European mechanical engineering industry.

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Lobbying Register: R000802
EU-Transparency Register ID: 9765362691-45

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