

Review of the EU Standardisation Regulation - survey for companies and industry organisations

Fields marked with * are mandatory.

Introduction

This survey will be open until Tuesday, 21st April 2026, 23:59 CEST.

This targeted survey is part of a consultation exercise envisaged in the Impact Assessment supporting Study accompanying the revision of the EU standardisation Regulation n. 1025/2012, which is currently being conducted by a consortium (Intellera Consulting and Fraunhofer ISI). The Study aims at analysing the difference options to review the Regulation and address the current issues of the European Standardisation System (ESS).

The impact assessment assesses the performance of the ESS in the evolving landscape of technical standardisation. It determines whether the existing framework is adequate and capable of delivering standards and technical specifications to support EU policy and legislative needs, while also maintaining global relevance.

Purpose and Scope

The primary objective of targeted surveys is to gather feedback from specific categories of stakeholders. Questions are therefore focused on the possible review of the Regulation (EU) 1025/2012 which might generate benefits or costs. This will allow the European Commission to assess the impact of the revisions on all stakeholders affected.

Data Protection Policy

Please consider that we are committed to maintain strict confidentiality protocols for all shared data. Access is restricted to the Consortium and the Commission, and online publication of raw data is prohibited. The analysis of data provided in this survey will be published exclusively in an aggregated and anonymised manner.

Before you commence the questionnaire, please carefully review, and accept the [privacy statement](#). This statement provides essential information regarding the use and handling of the data you provide. Your privacy and data protection are of utmost importance.

By checking on this box, you agree to the provisions outlined in the privacy statement regarding the protection of personal data.

We extend our gratitude for your participation in this critical assessment of the European Standardisation System, and we look forward to your valuable insights and contributions.

The original version of this survey is in English. All translated versions have been generated through machine translation and are provided for convenience only. In case of any discrepancy or ambiguity, please refer to the English version.

1. About you

* Q1: Name and Surname (this will not be published)

Frank Koos

* Q2: Name of your organisation (this will not be published)

EuroWindoor AISBL

* Q3: Email (this will not be published)

koos@eurowindoor.eu

* Q4: Which country is your organisation based in?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy

- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Norway
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- Other

* Q5: What category best describes you?

- Industry Association at the international level
- Industry Association at the EU/EEA level
- Industry Association at the national level
- Company operating at international level
- Company operating at EU/EEA level
- Company operating at national level

* Q6: To what extent are the companies you represent SMEs (i.e. from 1 to 249 employees)?

- No SMEs represented
- To a small extent
- To a large extent
- All companies are SMEs

* Q7: Choose the appropriate NACE code that aligns with your or your represented activity

- A - Agriculture, Forestry and Fishing
- B - Mining and Quarrying
- C - Manufacturing
- D - Electricity, Gas, Steam and Air Conditioning Supply
- E - Water Supply; Sewerage, Waste Management and Remediation Activities
- F - Construction
- G - Wholesale and Retail Trade
- H - Transportation and Storage
- I - Accommodation and Food Service Activities

- J - Publishing, Broadcasting, And Content Production and Distribution Activities
- K - Telecommunication, Computer Programming, Consulting, Computing Infrastructure and Other Information Service Activities
- L - Financial and Insurance Activities
- M - Real Estate Activities
- N - Professional, Scientific and Technical Activities
- O - Administrative and Support Service Activities
- P - Public Administration and Defence; Compulsory Social Security
- Q - Education
- R - Human Health and Social Work Activities
- S - Arts, Sports, and Recreation
- T - Other Service Activities
- U - Activities of Households as Employers and Undifferentiated Goods - And Service-Producing Activities of Households for Own Use
- V - Activities of Extraterritorial Organisations and Bodies
- Not applicable

* Q8: Regarding standardisation, in what ways does your organisation participate in the European Standardisation System (ESS)? Select all that apply

- Participates in standardisation activities (i.e., (i) the proposal and acceptance process of new work items, (ii) technical discussions on proposals, (iii) submission of comments on draft standards or deliverables, (iv) revision of existing European standards or deliverables, (v) dissemination and awareness-building about adopted European Standards or deliverables).
- Buys standards for direct use.
- Other.

* Q8.2: To which of the following sectors related to harmonised standards' legislation does your reply to the previous question applies? (If more than one, please specify in "Other")

- Accessibility of websites and mobile applications
- Chemicals (Chemical substances (REACH), Explosives for civil uses, Fertilising products, Pyrotechnic articles)
- Conformity assessment and management systems (New Legislative Framework (NLF) and Eco-Management and Audit Scheme (EMAS))
- Construction (Construction products (CPD/CPR))
- Consumers and working protection (Cosmetic products, General product safety, Personal protective equipment (PPE), Toy safety)
- Energy efficiency (Ecodesign and energy labelling)
- Electric and electronic engineering (Electromagnetic compatibility (EMC), Equipment for explosive atmospheres (ATEX), Low Voltage (LVD), Radio Equipment (RED), Restriction of the use of certain hazardous substances (RoHS))
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Healthcare engineering (In vitro diagnostic medical devices (Regulation 2017/746), Medical devices (Regulation 2017/745), Active implantable medical devices (Directive 90/385/EEC), In vitro diagnostic medical devices (Directive 98/79/EC), Medical devices (Directive 93/42/EEC)

- Measuring technology (Measuring instruments (MID), Non-automatic weighing instruments (NAWI))
- Mechanical engineering and means of transport (Cableway installations designed to carry persons, Equipment for explosive atmospheres (ATEX), Gas appliances (GAR), Inspection of pesticide application equipment, Lifts, Machinery (MD), Pressure equipment (PED), Rail system: interoperability, recreational craft and personal watercraft, Simple Pressure Vessels (SPVD), Unmanned aircraft systems (UAS))
- Services (Community postal services)
- Sustainability (Packaging and packaging waste, Plastic caps and lids)
- None of the above
- Other

Q8.5: Have you participated to technical committees for standards (also outside the ESS) in the following technological areas?

	Yes	No
* Artificial intelligence	<input type="radio"/>	<input checked="" type="radio"/>
* Quantum technology	<input type="radio"/>	<input checked="" type="radio"/>
* Critical space technology	<input type="radio"/>	<input checked="" type="radio"/>
* Electric vehicle charging infrastructure	<input type="radio"/>	<input checked="" type="radio"/>
* Additive manufacturing	<input type="radio"/>	<input checked="" type="radio"/>
* Cybersecurity	<input type="radio"/>	<input checked="" type="radio"/>
* Unmanned aircrafts	<input type="radio"/>	<input checked="" type="radio"/>

2. Speed and responsiveness

* Q10: How often do you think that harmonised standards are published in time for your business needs / the needs of the industry you represent?

- Never
 - Rarely
 - Frequently
 - Always
 - I don't know
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Please consider the possibility that the following measures will be undertaken.

- The Commission and ESOs roll out an innovative standardisation process for urgent needs.
- The ESOs implement internal quality reviews.

Q11: To what extent do you believe that these measures will support achieving the objective of simplifying and accelerating the development of high-quality standards?

	Not at all	To a small extent	To a moderate extent	To a large extent	To a very large extent	I don't know
* The Commission and ESOs roll out an innovative process for urgent needs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The ESOs implement internal quality reviews	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q12: Please elaborate on your response above, if necessary.

An innovative process for urgent needs may accelerate the process without jeopardizing quality in cases where it is adopting e.g. ISO standards as voluntary supporting standards under NLF framework, but when it comes to standards that is to be developed e.g. under CPR speed should never prevail over quality and this could be the case with such an innovative process.

Frequent changes and adjustments of guidance and templates, particularly for product standards of construction products, delay the process as it requires additional time-consuming modifications and leads to new discussions. Sufficient time must be provided for the standardisation committee to be able to develop the standards by consensus and at a high technical level. If time is to be saved, this must happen during the formal process steps, such as translation or the initiation of surveys and votings.

Q13: Please indicate the extent to which the measures listed below impact your company (i.e., benefits and costs). If you are replying as an industry association, please consider the point of view of the companies you represent.

	High cost	Moderate cost	No impact	Moderate benefit	High benefit	I don't know
* The Commission and ESOs roll out an innovative standardisation process for urgent needs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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The ESOs implement internal quality reviews	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Q14: Please elaborate on your response above, if necessary.

For the first example described in previous comment the benefits could be moderate with the innovative process but for harmonized standards under CPR it could have high costs if the technical quality of the standards are not sufficient.

Please consider the possibility that the following measures will be undertaken.

- Improve the standardisation process, notably through the digitisation of ESOs' activities through an Online Standard Development (OSD) platform
- Introduce legal deadlines and strengthen ESOs obligations, including monitoring and KPIs (based e.g. on a dashboard and a set of KPIs agreed within the Task Force EC/ESOs/EFTA)
- Review of the list of European Standardisation Organisations in Annex I of Regulation 1025/2012 (currently: CEN, CENELEC, ETSI).
- Create stronger incentives to mobilise more EU publicly funded researchers, such as HORIZON, and EU public financing into standardisation of strategic technologies
- Requirement that all harmonised standards are provided in a machine-readable format

Q15: To what extent do you believe that this measure will support achieving the objective of simplifying and accelerating the development of high-quality standards?

	Not at all	To a small extent	To a moderate extent	To a large extent	To a very large extent	I don't know
* Improve standardisation process, notably through digitisation of ESO activities through an Online Standard Development (OSD) platform	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Introduce legal deadlines and strengthen ESO obligations, including monitoring and KPIs (based e.g. on a dashboard and a set of KPIs agreed within the Task Force EC/ESOs/EFTA)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*						

Review of the list of European Standardisation Organisations in Annex I of the Regulation.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Require that all harmonised standards are provided in a machine-readable format	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Create stronger incentives to mobilise more EU publicly funded researchers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q16: Please elaborate on your response above, if necessary.

We appreciate the efforts to modernize standardization through digital tools, but would like to raise some important concerns regarding the current implementation of Online Standard Development (OSD) especially in large committees.

Coordination and timing challenges

The ability to introduce changes at virtually any time—including shortly before meetings—creates significant coordination difficulties. This compressed timeline often prevents adequate internal alignment, which is essential for well-considered contributions.

Quality and collaboration

Maintaining an overview of ongoing changes has become increasingly challenging. The traditional collaborative approach to drafting text is being replaced by isolated individual contributions, which risks diminishing both the collaborative spirit and the overall quality and coherence of the resulting standards.

Readability concerns

While we understand the technical advantages of machine-readable formats, the online presentation differs notably from traditional formats in ways that affect readability. The prioritization of machine-readability over human-centered design introduces unnecessary complexity and reduces needed flexibility.

A human-centered approach

Ultimately, standards serve people. We encourage a recalibration of OSD tools and processes to ensure that human needs, collaboration, and quality remain at the center of our work, rather than allowing technical systems to dictate the workflow.

Furthermore, involving additional ESOs or mobilizing more EU publicly funded researchers offers limited added value. The development timeline remains the same regardless of the ESO involved, and researchers often lack the specialized practical knowledge needed for specific technical topics, resulting in additional time spent correcting mistakes rather than accelerating the process.

An introduction of legal deadlines could potentially have negative consequences for the technical quality of the standards which could lead to high implementing/compliance cost in the market.

Q17: Please indicate the extent to which the measures listed below impact your company (i.e., benefits and costs). If you are replying as an industry association, please consider the point of view of the companies you represent.

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	High cost	Moderate cost	No impact	Moderate benefit	High benefit	I don't know
* Improve standardisation process, notably through digitisation of ESOs activities through an Online Standard Development (OSD) platform	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Introduce legal deadlines and strengthen ESOs obligations, including monitoring and KPIs (based e.g. on a dashboard and a set of KPIs agreed within the Task Force EC /ESOs/EFTA)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Review of the list of European Standardisation Organisations in Annex I of the Regulation.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Require that all harmonised standards are provided in a machine-readable format	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Create stronger incentives to mobilise more EU publicly funded researchers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q18: Please elaborate on your response above, if necessary.

An introduction of legal deadlines could potentially have negative consequences for the technical quality of the standards which could lead to high implementing/compliance cost in the market.

A requirement of having machine-readable standards will not support the objective of simplifying and accelerating the development of high-quality standards, but may have positive impact on the use of the standards.

Please consider the possibility that the following measures will be undertaken.

- When the ESOs cannot deliver a standard in time, open procurement of standards (allowing any standardisation organisation or relevant consortium to respond, subject to strict criteria and free availability of standards).
- When the ESOs cannot deliver a harmonised standard in time, use of a technical specification developed by the ESOs for temporary presumption of conformity until harmonised standard is ready.
- When the ESOs cannot deliver, use of existing standards developed by other organisations.
- When the ESOs cannot deliver, in-house development by consolidating expertise in the Commission or through an EU Office or Agency, which could be involved in developing (sectoral) standardisation strategies, selection of procured standards, assessment of draft harmonised standards and developing common specifications.
- Fully digitised standard-development processes including an integrated process of an Online Standard Development (OSD) platform, machine readable formats and translation tool.
- Procurement of standards allowing for full publication.

Q19: To what extent do you believe that these measures will support achieving the objective of simplifying and accelerating the development of high-quality standards?

	Not at all	To a small extent	To a moderate extent	To a large extent	To a very large extent	I don't know
* When the ESOs cannot deliver, open procurement of standards (allowing any standardisation organisation or relevant consortium to respond subject to strict criteria and free availability of standards)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* When the ESOs cannot deliver a harmonised standard in time, use of a technical specification developed by the ESOs for temporary presumption of conformity until harmonised standard is ready	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* When the ESOs cannot deliver, use of existing standards	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fully digitised standard-development processes including an integrated process of Online						

Standard Development (OSD) platform, machine readable formats and translation tool	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* When the ESOs cannot deliver, in-house development by consolidating expertise in the Commission or through an EU Office or Agency, which could be involved in developing (sectoral) standardisation strategies, selection of procured standards, assessment of draft harmonised standards and development of common specifications	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Procurement of standards allowing for full publication	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Q20: Please elaborate on your response above, if necessary.

Response on Delays in Delivering Harmonised Standards

When European Standardization Organizations (ESOs) are unable to deliver harmonised standards within the expected timeframe it may be caused by complex technical discussions and therefore it will not be a workable solution to give the task to someone else. But more often the reasons typically lie beyond the control of both the ESOs and the standards developers themselves.

Root causes include:

- Unrealistic timelines and deadlines for developing comprehensive product standards, including supporting standards
- Unclear or frequently changing requirements from the European Commission
- Lack of guidance documents and delayed delegated acts
- Missing or delayed input from horizontal committees operating on different schedules
- Late assessment at the end of the standardization process and insufficient involvement of Member States during development

The importance of early engagement

Early and active participation by Member States throughout the standardization process is crucial. It prevents misdevelopment, avoids costly late-stage revisions and saves significant time. Waiting until final assessment to raise concerns creates avoidable delays.

The need for improvement

Better, timely and stable guidance for all stakeholders involved in writing standards that meet citation requirements is urgently needed. Clear direction from the outset, combined with continuous engagement and realistic timelines, would significantly improve both efficiency and quality of the standardization process.

We encourage the Commission and all relevant bodies to prioritize stable frameworks and structured early involvement of all parties.

Q21: Please indicate the extent to which the measures listed below impact your company (i.e., benefits and costs). If you are replying as an industry association, please consider the point of view of the companies you represent.

	High cost	Moderate cost	No impact	Moderate benefit	High benefit	I don't know
* When the ESOs cannot deliver, open procurement of standards (allowing any organisation or relevant consortium to respond subject to strict criteria and free availability of standards)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* When the ESOs cannot deliver a harmonised standard in time, use of a technical specification developed by the ESOs for temporary presumption of conformity until harmonised standard is ready	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* When the ESOs cannot deliver, use of existing standards	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* When the ESOs cannot deliver, in-house development by consolidating expertise in the Commission or through an EU Office or Agency, which could be involved in developing (sectoral)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

standardisation strategies, selection of procured standards, assessment of draft harmonised standards and development of common specifications						
* Fully digitised standard-development processes including an integrated process of Online Standard Development (OSD) platform, machine readable formats and translation tool	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Procurement of standards allowing for full publication	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Q22: Please elaborate on your response above, if necessary.

It is typically the technical details that will determine if showing compliance to a standard is economically and administratively feasible and therefore when a delivery of a standard is delayed due to complex technical discussions it could lead to very high costs if wrong conclusions are made.

Please consider the possibility that the following measures will be undertaken.

- Open procurement of standards (allowing any standardisation organisation, ESOs included, or relevant consortium to respond subject to strict criteria and free availability of standards), with no privilege for ESOs.
- Use of existing standards, with no privilege for ESOs.
- In-house development by consolidating expertise in the Commission or through an EU Office or Agency, which could be involved in developing (sectoral) standardisation strategies, selection of procured standards, assessment of draft harmonised standards and developing common specifications, with no privilege for ESOs.

Q23: To what extent do you believe that these measures will support the achievement of the objective of simplifying and accelerating the development of high-quality standards?

	Not at all	To a small extent	To a moderate extent	To a large extent	To a very large extent	I don't know
*						

Open procurement of standards (allowing any standardisation organisation, ESOs included, or relevant consortium to respond subject to strict criteria and free availability of standards), with no privilege for ESOs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Use of existing standards, with no privilege for ESOs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* In-house development by consolidating expertise in the Commission or through an EU Office or Agency, which could be involved in developing (sectoral) standardisation strategies, selection of procured standards, assessment of draft harmonised standards and development of common specifications, with no privilege for ESOs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q24: Please elaborate on your response above, if necessary.

Q25: Please indicate the extent to which the measures listed below impact your company (i.e., benefits and costs). If you are replying as an industry association, please consider the point of view of the companies you represent.

	High cost	Moderate cost	No impact	Moderate benefit	High benefit	I don't know
* Open procurement of standards (allowing any standardisation organisation, ESOs included, or relevant consortium to respond subject to strict criteria and	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

free availability of standards), with no privilege for ESOs						
* Use of existing standards, with no privilege for ESOs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* In-house development by consolidating expertise in the Commission or through an EU Office or Agency, which could be involved in developing (sectoral) standardisation strategies, selection of procured standards, assessment of draft harmonised standards and development of common specifications, with no privilege for ESOs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q26: Please elaborate on your response above, if necessary.

Spreading the development of standards wider will make industry involvement more difficult and the input from the industry is essential to ensure that the standards are technically feasible to implement and comply with in an economically and administratively proportional way.

3. Inclusiveness and participation

* Q27: To what extent does the current EU standardisation framework provide clear and predictable procedures for developing new standards in your sector?

- Not at all
- To a small extent
- To a moderate extent
- To a large extent
- To a very large extent
- I don't know

Q28: To what extent do the current ESOs guarantee effective participation in the development of standards for the following stakeholder groups?

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	Not at all	To a small extent	To a moderate extent	To a large extent	To a very large extent	I don't know
* Industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Annex III organisations and societal stakeholders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Academia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Q29: Could you please provide an estimate for the number of experts you employ every year to participate in technical work on standards? Please insert "No" if not applicable.

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Q30: Could you please provide an estimate of the number of sessions (technical committees and/or working groups) your experts attend every year – considering the different organisations listed below? Please insert "No" if not applicable.

Activity	Number of sessions
Technical committees and working groups of ESOs	15-20
Technical committees and working groups of ISO/IEC/ITU	10
Technical committees and working groups of other SDO/industry consortia	0

Q31: Could you please provide an estimate of the average costs - including reimbursement of travel expenses, etc. - that you pay for experts each year (in EUR)? Please insert "No" if not applicable.

Activity	Average cost
Technical committees and working groups of ESOs	1000 €
Technical committees and working groups of ISO/IEC/ITU	2000 €
Technical committees and working groups of other SDO/industry consortia	0

Q32: Please provide any other relevant information concerning costs, if available.

Labour costs are not taken into account. The option to participate online to meetings had reduced the travel costs a lot. Sometimes it is necessary to attend in person, but this happens only occasionally. Due to the problems having standards cited in the past the cost and number of meetings have been smaller than what is expected soon as we are initiating work on standards to be cited under new CPR. ISO standardisation is generally more expensive, as meetings are also held in locations further afield.

Please consider the possibility that the following measures will be undertaken.

- Legal obligations for ESOs and NSBs are strengthened to promote the involvement of SMEs by revising the provisions in Article 6 of [Regulation 1025/2012](#) concerning access of SMEs to standards.
- Direct support for expert participation is offered and/or the relation between EU Research and Innovation (R&I) funded projects and standardisation processes is improved.
- A standardisation ecosystem for innovation and pre-normative work is promoted.

Q33: To what extent do you think that these measures will support the achievement of the objective to improve inclusiveness and involvement in the standardisation processes?

	Not at all	To a small extent	To a moderate extent	To a large extent	To a very large extent	I don't know
* Legal obligations for ESOs and NSBs are strengthened to promote the involvement of SMEs by revising the provisions in Article 6 of Regulation 1025 /2012 concerning access of SMEs to standards.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Direct support for expert participation is offered and/or the relation between EU Research and Innovation (R&I) funded projects and standardisation processes is improved.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A standardisation ecosystem for innovation and pre-normative work is promoted.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q34: Please elaborate on your response above, if necessary.

Legal obligations is not the way forward in making SME's interested in participating in standardisation.

Q35: Please indicate the extent to which the measures listed below impact your organisation (i.e., benefits and costs). If you are replying as an industry association, please consider the point of view of the companies you represent.

	High cost	Moderate cost	No impact	Moderate benefit	High benefit	I don't know
* Legal obligations for ESOs and NSBs are strengthened to promote the involvement of SMEs by revising the provisions in Article 6 of Regulation 1025/2012 concerning access of SMEs to standards.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Direct support for expert participation is offered and /or the relation between EU Research and Innovation (R&I) funded projects and standardisation processes is improved.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A standardisation ecosystem for innovation and pre-normative work is promoted.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Q36: Please elaborate on your response above, if necessary.

Please consider the possibility that the following measures will be undertaken.

- The standard development process becomes fully digitised including systematic online access.
- A stronger governance and oversight of ESOs is ensured.

- Criteria to ensure adequacy of standards to civil society and SMEs needs are introduced.
- Creation of a European framework for the development of pre-norms which is fully inclusive.
- Introduction of strong obligations for ESOs concerning SMEs and societal stakeholders' involvement, including voting rights.

Q37: To what extent do you think that these measures will support the achievement of the objective to inclusiveness and involvement in the standardisation processes?

	Not at all	To a small extent	To a moderate extent	To a large extent	To a very large extent	I don't know
* The standard development process becomes fully digitised.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A stronger governance and oversight of ESOs is ensured.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Criteria to ensure adequacy of standards to civil society and SMEs needs are introduced.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Creation of a European framework for the development of pre-norms which is fully inclusive.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Introduction of strong obligations concerning SMEs and societal stakeholders' involvement, including on voting rights.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q38: Please elaborate on your response above, if necessary.

Some of these measures may have negative impact on accelerating the development process.

Q39: Please indicate the extent to which the measures listed below impact for your organisation (i.e., benefits and costs). If you are replying as an industry association, please consider the point of view of the companies you represent.

	High cost	Moderate cost	No impact	Moderate benefit	High benefit	I don't know
*						

The standard development process becomes fully digitised.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A stronger governance and oversight of ESOs is ensured.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Criteria to ensure adequacy of standards to civil society and SMEs needs are introduced.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Creation of a European framework for the development of pre-norms which is fully inclusive.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Introduction of strong obligations concerning SMEs and societal stakeholders' involvement, including on voting rights.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q40: Please elaborate on your response above, if necessary.

4. Access and transparency

* Q41: To what extent is it easy to find and obtain the harmonised standard(s) that best meet your organisation needs?

- Not at all
- To a small extent
- To a moderate extent
- To a large extent
- I never faced any accessibility/access problem
- I don't know

* Q42: How often have you decided not to buy a standard due to its cost?

- Always
- Often
- Sometimes

- Rarely
- Never
- I don't know

* Q42.1: How did you overcome the challenge posed by the cost of the standard?

- Buy the standard through another national standardisation body
- Buy other standards (not harmonised)
- Use of open-source specifications, summaries, guidance's or other materials
- Request to the European Commission to obtain access to the standard(s) for public interest use
- Other

* Q42.1.1: If you have selected "Other", please specify

Working with FprEN or FDIS versions.

* Q43: How often have you used the CEN CENELEC's readability platform for harmonised standards made available under Regulation (EC) No 1049/2001?

- Often
- Sometimes
- Rarely
- Never
- I am not aware of this platform

* Q44: To what extent do ESOs, the NSBs and the European Commission communicate clearly and in a timely manner about new standardisation initiatives and consultation opportunities?

- Not at all
- To a small extent
- To a moderate extent
- To a large extent
- To a very large extent
- I don't know

Please consider the possibility that the following measure will be undertaken.

- Enforce the [readability platform system](#) to ensure accessibility.
- Legally relevant content to be published in the Official Journal of the European Union
- Procurement of standards allowing for full publication
- Introduce a free access to all harmonised standards or standards mandatory in EU legislation

Q45: To what extent do you think that these measures will support the achievement of the objective to improve access to standards and legal quality of the standardisation process?

	Not at all	To a small extent	To a moderate extent	To a large extent	To a very large extent	I don't know
* Enforce the readability platform system to ensure accessibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Relevant content to be published in the Official Journal of the European Union	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Procurement of standards allowing for full publication	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Introduce a free access to all harmonised standards or standards mandatory in EU legislation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q46: Please elaborate on your response above, if necessary.

Basically all of the above solutions will improve the access to standards but it is difficult to see how it should improve the legal quality of the standardisation process.

5. EU global role

* Q47: Where are the majority of standards you use originally developed? If you are replying as an organisation, please consider the point of view of the companies you represent

- Standards from international standardisation organisations (ISO/IEC/ITU)
- Standards originally borne in European Standardisation Organisations (ESOs)
- Standards from other EU SDOs / industrial consortia
- Standards from other non-EU SDOs / industrial consortia
- Open-source technical references
- I don't know

* Q48: Do you think that the harmonised standards respond well to the market developments in your industry?

- Not at all
- To a small extent
- To a moderate extent
- To a large extent

- To a very large extent
- I don't know

Please consider the possibility that the following measures will be undertaken.

- Improved planning and foresight for addressing standardisation needs (earlier in the technological lifecycle).
- Increased involvement and coordination of EU experts by the European Commission in international standardisation, and promotion of the European Commission as a centre of expertise.
- Allowing the Commission to request that hENs and other necessary standards are developed in a restricted setting by EU/EEA stakeholders only, for reasons of sensitivity or security.

Q49: To what extent do you think that these measures will support the achievement of the objective to strengthen EU presence and impact on international standardisation?

	Not at all	To a small extent	To a moderate extent	To a large extent	To a very large extent	I don't know
* Improved planning and foresight for addressing standardisation needs (earlier in the technological lifecycle).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increased involvement and coordination of EU experts by the European Commission in international standardisation, and promotion of the European Commission as a centre of expertise.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Allowing the Commission to request that hENs and other necessary standards are developed in a restricted setting by EU/EEA stakeholders only, for reasons of sensitivity or security.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q50: Please elaborate on your response above, if necessary.

For companies acting globally the last proposal will only result in having dual requirements to fulfill for same products which will lead to increased cost without any real added value.

The second proposal should only be done if it will not result in ISO/IEC requiring a change in voting rights, so that EU Countries will not be able to have one vote each but EU as a whole will have one vote.

Q51: Please indicate the extent to which the measures listed below impact your organisation (i.e., benefits and costs). If you are replying as an industry association, please consider the point of view of the companies you represent.

	High cost	Moderate cost	No impact	Moderate benefit	High benefit	I don't know
* Improved planning and foresight for addressing standardisation needs (earlier in the technological lifecycle).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increased involvement and coordination of EU experts by the European Commission in international standardisation, and promotion of the European Commission as a centre of expertise.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Allowing the Commission to request that harmonised standards and other necessary standards are developed in a restricted setting by EU/EEA stakeholders only, for reasons of sensitivity or security.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q52: Please elaborate on your response above, if necessary.

Regarding the second option, EU experts should be drawn from sector-related stakeholder business organizations to ensure the necessary expertise.

Please consider the possibility that the following measures will be undertaken.

- Possibility to derogate from the [Vienna](#) and [Frankfurt](#) agreements (including the “international first” principle) when European strategic and competitive needs are not regarded or potentially damaged by international standardisation activities.
- Improved strategic planning & coordination.
- Fostering joint position of EU actors in International Standardisation Organisations.

Q53: To what extent do you think that these measures will support the achievement of the objective to strengthen EU presence and impact on international standardisation?

	Not at all	To a small extent	To a moderate extent	To a large extent	To a very large extent	I don't know
* Possibility to derogate from the Vienna and Frankfurt agreements, as well as to the principle “international first” when European strategic and competitive needs are not regarded or potentially damaged by international standardisation activities.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improved strategic planning & coordination	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fostering joint position of EU actors in International Standardisation Organisations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q54: Please elaborate on your response above, if necessary.

For standards developed under CPR a possibility to derogate from Vienna agreement and international first principle could be beneficial. For other areas the advantage will be more limited.
 The third proposal should only be done if it will not result in ISO/IEC requiring a change in voting rights, so that EU Countries will not be able to have one vote each but EU as a whole will have one vote only.

Q55: Please indicate the extent to which the measures listed below impact your organisation (i.e., benefits and costs). If you are replying as an industry association, please consider the point of view of the companies you represent.

							I don't know
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	High cost	Moderate cost	No impact	Moderate benefit	High benefit	to know
* Possibility to derogate from the Vienna and Frankfurt agreements, as well as to the principle “international first” when European strategic and competitive needs are not regarded or potentially damaged by international standardisation activities.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improved strategic planning & coordination	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fostering joint position of EU actors in International Standardisation Organisations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Q56: Please elaborate on your response above, if necessary.

On the first proposal there will most likely be benefits for standards developed under CPR as non-EU countries are not interested in EU legislation.

On the third proposal it is difficult to predict benefits/costs. If the result of this is that EU NSB no longer have one vote each it would have severe negative consequences whereas it could prove beneficial if voting rights are kept as today.

Final section

Q57: Do you have any final remark?

* Q58: Intellera may need to contact you for a follow up interview to refine the understanding of your replies. In such case, Intellera will contact you using the email provided at the beginning of the survey.

Would you give your availability?

- Yes
 No

You have reached the end of the survey. Thank you!

Contact

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