

**ETUC contribution to the Draft Report on the proposal for amendments to regulation (EU) 1025/2012, by the IMCO Rapporteur Svenja Hahn [document 2022/0021(COD) of 29 April 2022].**

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The ETUC does not question the European standardisation system as governed by Regulation (EU) No 1025/2012, nor the process by which the European Commission, in line with specific procedures, can mandate the development of standards and standardisation deliverables to support Union legislation and policies.

The ETUC further agrees that when the European standardisation organisations, as defined in Article 2 of the Standardisation Regulation, develop standards to support Union legislation and policies, their internal governance must take into account the views and interests of all European stakeholders.

The ETUC therefore welcomes that the proposed amendment to the Regulation aims to safeguard good governance principles in the delivery of harmonised standards, and to strengthen the role of National standardisation bodies of the EU and EEA area in the decision-making process, within the system.

However, the ETUC stresses the need to ensure a balanced representation of interests within the National standardisation bodies. It is not enough to limit the decision-making power to NSBs if the objective is to ensure sufficient checks and balances. National standardisation bodies must facilitate the appropriate representation of all national interests, including trade unions and worker representatives when the standards have an impact on workers and workers' conditions. National delegations from the European standardisation bodies cannot only represent industrial interests if the standards are going to be used to show compliance with rules imposed in the wider public interest.

The ETUC **does not support the amendment 1**, as laid down in the draft report of Rapporteur Svenja Hahn [document 2022/0021(COD) of 29 April 2022].

Considering that the objective of the proposal from the Commission is to limit only the *decisions*, and not the actual execution of the standardisation requests, to (the representatives of) the NSBs of the EU and the EEA, the ETUC does **not support the amendments 2 and 3**, as laid down in the draft report of Rapporteur Svenja Hahn [document 2022/0021(COD) of 29 April 2022]. The continued participation of non-EU and non-EEA countries in the work of decision-making bodies of the ESO's will not be affected by the amendment to the regulation, as proposed by the Commission.

In addition, the ETUC proposes the IMCO Committee:

Commission Proposal	ETUC Amendment Proposal
<p><b>Recital 6</b></p> <p>The decision-making bodies of the European standardisation organisations are open to participation not only by national standardisation bodies, but also by national standardisation organisations of acceding countries, candidate countries and potential candidates to the Union, among others. In order to avoid excluding those organisations from participation in the work of decision-making bodies concerned, it is only necessary to provide that the decisions in those bodies concerning European standards and European standardisation deliverables requested under Article 10(1) of Regulation (EU) No 1025/2012 be taken exclusively by representatives of national standardisation bodies, without imposing any other requirements on the work of the decision-making bodies of the European standardisation organisations.</p>	<p><b>Recital 6</b></p> <p>The decision-making bodies of the European standardisation organisations are open to participation not only by national standardisation bodies, but also by national standardisation organisations of acceding countries, candidate countries and potential candidates to the Union, among others. In order to avoid excluding those organisations from participation in the work of decision-making bodies concerned, it is only necessary to provide that the decisions in those bodies concerning European standards and European standardisation deliverables requested under Article 10(1) of Regulation (EU) No 1025/2012 be taken exclusively by representatives of national standardisation bodies <b>of the EU and the EEA</b>, without imposing any other requirements on the work of the decision-making bodies of the European standardisation organisations.</p>
<p>2a.</p> <p>Each European standardisation organisation shall ensure that the following decisions concerning European standards and European standardisation deliverables referred to in paragraph 1 are taken exclusively by representatives of the national standardisation bodies within the competent decision-making body of that organisation:</p>	<p>2a.</p> <p>Each European standardisation organisation shall ensure that the following decisions concerning European standards and European standardisation deliverables referred to in paragraph 1 are taken exclusively by representatives of the national standardisation bodies, <b>which include a balanced representation of all stakeholders that have an interest, notably trade unions</b>, within the competent decision-making body of that organisation:</p>