







Brussels, 27 June 2025

To Executive Vice-President Stéphane Séjourné To Executive Vice-President Roxana Mînzatu

Copy to:

ISO President Dr Sung Hwang Cho
ISO Vice president Policy Christoph Winterhalter
ISO Vice president Technical Management Javier Garía
ISO Secretary General Sergio Mujica
CEN President Stefano Calzolari
CEN-CENELEC Director General Elena Santiago-Cid

Subject: Standardisation bodies must refrain from issuing social standards

Dear Executive Vice-President Séjourné, Dear Executive Vice-President Roxana Mînzatu,

The Competitiveness Compass presented on 29 January 2025 sets out actions identified by the European Commission to strengthen the EU's competitiveness and secure its prosperity. Some of these actions revolve around technical standardisation:

- Make the standard-setting processes faster and more accessible;
- Increase engagement and influence in the global standard setting;
- Explore alternative options when harmonised standards do not exist and are urgently needed.

These points are expected to be addressed in the revision of EU Regulation 1025/2012 on Standardisation.

Social partners play a key role in the governance of the employment relationship. We are key actors in industrial relation systems. This is enshrined in article 154 and 155 of the Treaty on the Functioning of the European Union (TFEU). Social partners shape working conditions and influence social policy, also in EU Member States. We are interlocking parts in a multilevel system of governance that includes the European, national, sectoral, regional (provincial or local), company and establishment levels.

Social partners support the need for *technical* standards, both harmonised and non-harmonised. Industry relies on standards to boost innovation, enable interoperability and facilitate exchanges and cooperation. Meanwhile, the European institutions increasingly use standards to shape the single market of products and services.

However, our key message in the run up to the revision of EU Regulation 1025/2012 is that while we support technical standardisation, standards must not address issues that could fall within the scope of social dialogue. This principle is fully shared by the European social partners and is grounded in the EU treaties.

Over the last decade, however, we have noticed that private standardisation bodies have drafted – and continue drafting – standards addressing human resource management, social responsibility (EN ISO 26000), internships, forced labour and modern slavery, services, AI, etc. These are all new standardisation fields in which, contrary to the past, social partners' issues have started appearing. We would like to put specific emphasis on our firm rejection of the proposal to revise ISO 26000 "Guidance on Social Responsibility". A revision process would undermine and create divergence of universally accepted and carefully negotiated standards on social issues, which have been painstakingly developed by social partners and governments.

The expansion of *technical* standards towards the inclusion of social content often takes place at the global level within an integrated ecosystem of national, European and international standardisation bodies governed by agreements of private commercial law, therefore beyond the easy reach and influence of social partners. This ecosystem with its own special governance lacks both the legitimacy and the mandate for the elaboration of standards addressing social content, as opposed to social dialogue between social partners. Once these global standards are drafted - with or without the contributions of social partners - adopted and then implemented in Europe, they risk encroaching upon social dialogue and European values.

Maintaining a seamless integration with the international work is just as essential as ensuring that competent social partner positions are respected. To combat increasing encroachment on social partner domains and promote its own values and vision, Europe must find ways to effectively set its international leverage into effect.

<u>To conclude:</u> Social partners request that standardisation activities remain 'technical'. Technical standards – be these harmonised or non-harmonised, European or international - cannot address matters related to social dialogue, which are exclusively to be negotiated by the social partners, as enshrined in the TFEU.

With that in mind, we look forward to the opportunity of further discussing this important matter in person. We remain available for a follow up meeting at your best convenience.

With very best regards,

For ETUC

For BusinessEurope

For SMEunited

For SGI Europe

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