



ETUC contribution to the Call for Evidence for an impact assessment for the revision of the New Legislative Framework (NLF)

The New Legislative Framework (NLF) is of key importance for the functioning of the Single Market and an efficient quality infrastructure (QI)¹. It is based on harmonised standards, market surveillance, conformity assessment, accreditation, certification and metrology.

A weakness in one component, creates a weakness in the overall Framework. Updating it to keep up with new social and economic developments and to remain aligned with European values is therefore crucial.

General remarks on standardisation

Standardisation and standards are a key component of the QI. A timely publication of “good” European (harmonised) standards is essential for the safety and conformity of products placed on the Single Market.

Standards that (directly) affect workers can only be good when trade unions are actively involved in the standardisation process and able to exert a decisive influence. At present, however, the safeguarding of societal interests, the assurance of inclusivity, and the guarantee of democratic legitimacy in the field of standardisation is far from secure. A central problem is the existing imbalance: business related actors are overrepresented in standardisation, while societal actors such as trade unions have only limited opportunities to influence the process. Standardisation must under no circumstances replace democratic lawmaking.

Lately, the referencing harmonised standards in the OJEU almost came to a halt — due to legitimacy gaps in the system, reflected in disputes with ISO and IEC, court cases, assessments by HAS consultants and administrative delays within the European Standardisation Organisations and/or the Commission services. As a result, several [harmonised standards that underpin the NLF](#) (e.g. EN ISO 9001, EN ISO 1400 series, EN ISO/IEC 17000 series) are outdated.

To address these different issues, in 2026, the Commission will come forward with a revision for the regulation 1025/2012 on standardisation. It is essential that this process addresses fundamental questions of democratic legitimacy. Standards are often developed by commercial interests which are not subject to democratic control. In addition, decision-making processes frequently lack transparency. The diversity of participating actors is insufficient, with large companies exerting disproportionate

¹ For a better an understanding of the QI see, for example, [here](#)



influence. There is also an increasing influence from global standardisation organisations whose approaches are not always in line with European values. We firmly reject any alignment with the lowest international standards. Efficiency gains are welcome, but they must not come at the expense of quality, legal certainty, or democratic participation. Therefore, fine tuning of the political goal of primacy of international standards, is needed.

Furthermore, the number of standards with social and political implications is steadily increasing. Standardisation is no longer confined to purely technical matters; it increasingly extends into areas traditionally within the competence of the social partners. We therefore call for a clear limitation of standardisation to ensure that standards do not address social questions or fundamental rights.

Specific remarks on the NLF

Only safe and reliable products (e.g. machine tools, Personal Protective Equipment, etc.) provide a safe work environment. Non-compliant products are a major source for accidents and create additional healthcare costs (which are mostly carried by the public healthcare systems and ultimately paid for by the taxpayers).

Too many defective or non-compliant products circulate on the European market. Market surveillance authorities are understaffed: they have no longer the capacity to survey the market. To make the case: In Belgium, cheap imports from China (e.g. Shein, Temu, AliExpress, etc) increased from 1.700 parcels/day (in 2017) to 3 million/day (in 2024)². But customs capacity has not followed. Today, only 1% of parcels are checked.

An effective and efficient Market Surveillance system will also ensure that European manufacturers and industry (which provide jobs) face an equal playing field with non-European manufacturers.

Therefore, the ETUC calls up to strengthen the market surveillance capacity, essentially by increasing their staffing. Market Surveillance authorities should also be supported with proper training and their independent investigative powers should be respected.

In addition, the rules on the requirements for the notification of conformity assessment bodies should be confirmed. The system is particularly important for the placement of innovative products on the market, especially with regard to high-risk products and technologies.

A sufficiently large and well-resourced infrastructure of notified bodies is essential for legal certainty and ultimately operational safety in the single market. Notified bodies and accreditation bodies must ensure that methods for testing innovative technologies are available or are developed.

² See [Belgian social partners position on e-commerce](#)