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Deutsche Sozialversicherung  
Europavertretung | DSV

# Feedback from German Social Insurance issued 15 December 2025

in the context of the public consultation on the proposal to  
revise the “EU Standardisation Regulation”



## I. Preliminary remark

Regulation (EU) No 1025/2012 governs European standardisation. The European standardisation system provides a valuable framework, the future-proof design of which is a particular concern of the German Social Insurance (DSV). However, a reform of this successful system should be carried out with restraint and should respect the established structures, in particular with regard to the established standardisation organisations, product standardisation in occupational safety and health, the planned increased use of common specifications, and the standardisation process. From the perspective of the DSV, it is crucial that, in the case of standards related to occupational safety and health, a clear distinction is made between product-related standards and standards for workplace occupational safety and health. Common specifications should be used only in clearly limited exceptional cases and must not weaken the European standardisation system. The consensus principle must be preserved. External procurement procedures also carry the risk that standards are developed without broad consensus and may lead to legal and technical problems. Only under these conditions can the functionality of and trust in a system be maintained that has for years ensured safety, innovation, and broad acceptance in Europe.

## II. Opinion

### 1 \_ Role of standardisation in workplace occupational safety and health

From the perspective of the DSV, standardisation has an important but clearly limited function. Harmonised standards are a key instrument at European level for specifying requirements relating to the characteristics of products and for preventing conflicting standards. They support a functioning internal market, promote innovation, and ensure high safety and quality standards. The safety and health of employees, however, are regulated by law, which means that binding minimum requirements apply within the EU. Unlike product law (Article 114 TFEU), labour law (Article 153 TFEU) does not provide for these requirements to be specified or further developed through standards. In workplace occupational safety and health, concretisation instead takes place through national statutory provisions and, in Germany, through the regulations of the statutory accident insurance institutions and the set of rules of the German Social Accident Insurance (DGUV). This principle must be strictly upheld in the revision of the EU Standardisation Regulation.



## **2 \_ Consensus principle**

The European standardisation system is based on the consensus principle, which presupposes balanced participation of all relevant stakeholder groups. Only in this way can a sustainable consensus emerge that meets both technical requirements and societal expectations. The DSV therefore emphasises that quality must take precedence over speed. Building consensus requires time, especially in the case of complex, far-reaching, or innovation-related standardisation projects. While standards with a limited scope of application can be developed relatively quickly, demanding projects require careful coordination and thorough review. Statutorily prescribed shortening of procedures would jeopardise this principle. It could restrict comprehensive stakeholder participation and thus impair the acceptance, quality, and legitimacy of standardisation.

## **3 \_ Role of standardisation organisations**

The DSV strongly advises against the proposed approaches

- \_ to regularly revise the list of recognised European standardisation organisations, and
- \_ to mandate other standardisation organisations to develop harmonised European standards or to adopt their standards (“shopping for standards”).

This endangers the coherence of the entire European body of standards and thus the European internal market. In addition, procuring standards outside the European standardisation system runs counter to the objective of shaping standards worldwide in line with European values and deprives Europe of the ability to actively shape standards itself (from a “standards maker” to a “standards taker”). Participation by stakeholders involved in the standardisation process would be made more difficult. Even now, these stakeholders are only able to participate to a limited extent in the many standardisation committee meetings that may be relevant to them. In order not to further hinder participation opportunities, structures and processes must remain clear and manageable. Such clarity prevents additional administrative and financial burdens on the resources of societal stakeholder groups.

#### **4 \_ Common specifications**

The DSV takes a critical view of the approach of using common specifications as a regulatory fallback instrument. To date, there is a lack of both transparent decision-making criteria and clear participation procedures and defined process steps. The involvement of societal stakeholders is of particular importance. If this involvement is absent or limited, it is not compatible with the objective of improving the inclusiveness of the standardisation system and enabling balanced representation of interests. The development of common specifications must therefore be carefully planned and designed as a multi-stage decision-making process. Uniform, comprehensible, and transparent criteria are required that clearly regulate under which conditions and on what decision-making basis common specifications are developed. The following applies: time pressure must not be at the expense of quality. Standards and safety-relevant specifications directly serve to protect employees from injuries and fatalities. Speed must therefore never take precedence over diligence.

For this reason, a standardisation mandate to the European standardisation organisations should always be examined and given priority. Common specifications may only be initiated if such a mandate has demonstrably been rejected or has not been accepted. This decision must be documented and made publicly available. In addition, the standardisation organisations should be given the opportunity to review their rejection. If delays occur in the standardisation process, the cause should be systematically analysed. A clear distinction must be made between process-related delays, for example, due to international coordination procedures, and substantive blockages, for instance, due to a lack of consensus on compliance with statutory requirements. Process-related delays must not lead to the initiation of common specifications. Substantive blockages, by contrast, may constitute a legitimate reason for the development of common specifications.



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## About us

The German Federal Pension Insurance (DRV Bund), the German Social Accident Insurance (DGUV), the National Association of Statutory Health Insurance Funds (GKV-Spitzenverband), the national associations for statutory health and long-term care insurance funds at the federal level and the Social Insurance for Agriculture, Forestry and Horticulture (SVLFG) have joined forces to form the "German Social Insurance - Working Group Europe" (Deutsche Sozialversicherung Arbeitsgemeinschaft Europa e. V.) with a view to their common European policy interests. The association represents the interests of its members vis-à-vis the bodies of the European Union (EU) as well as other European institutions and advises the relevant stakeholders in the context of current legislative projects and initiatives. As part of the statutory insurance system in Germany, health and long-term care insurance with 75 million insured persons, pension insurance with 57 million insured persons and accident insurance with more than 70 million insured persons in 5.2 million member companies offer effective protection against the consequences of major risks of life.