

Position Paper

Euralarm Response to EC call for evidence on revision of Standardisation Regulation (1025/2012) – 14 July 2025

1. Introduction

Euralarm has carefully reviewed the [call for evidence](#) issued by the European Commission on revision of the Standardisation Regulation. Besides the call for evidence itself, Euralarm also considered other Commission documents related to the whole context, e.g. the Omnibus IV initiative, the accompanying Staff Working Document [SWD\(2025\) 130](#) about Common Specifications and the three published Common Specifications supporting the Medical Device Regulation and the Regulation on In Vitro Diagnostic Medical Devices: [\(EU\) 2020/1207](#), [\(EU\) 2022/1107](#) and [\(EU\) 2022/2346](#).

Euralarm is of the opinion that the majority of harmonised standards clearly specify the expectations of the products, devices and services intended and thus serve the practical needs of the sectors they cover. However, Euralarm also generally agrees with the observation that the current system for production and citation of harmonised standards doesn't deliver at a level that allows the Single Market to work as intended. We also generally agree with the text provided in the call for evidence under the headline "Problem the initiative aims to tackle" and listing the issues we can all observe. The present Position Paper is based on those issues for which we would like to put forward some constructive proposals.

Fundamentally, Euralarm agrees that simplification is needed to reduce the administrative burden on bringing products to the market – but it is wholly inappropriate and misleading to focus on reducing the technical content of harmonised standards while increasing the complexity of the processes by which harmonised standards are regulated. The 1025 regulation is largely fit for purpose and familiar – any changes need to make a significant difference to the administrative burden and not increase the complexity of bringing products to the market.

2. Proposals aiming to solve the issues

2.1. *Speed of hEN development*

The development process for harmonised standards is currently very similar to the one for non-harmonised ones: vote on New Work Item (NWI), inclusiveness, consensus-based drafting, translations, enquiry and formal vote stages involving National Standardisation Bodies. The current ESOs could be forced to revisit the specific process for harmonised standards. The vote on NWI is possibly not necessary for hEN's as soon as the ESO has accepted the standardisation request. Translations before adoption are probably not necessary anymore today, enquiry and formal vote stages could be shortened.

Regarding the content, the wish to produce very detailed harmonised standards is lengthily with the consensus-based approach. We think that the consensus-based approach should be kept in order to ensure that the diversity of the market is duly reflected in the end result and to ensure that all the stakeholders involved by the inclusiveness principle have their say in the drafting. However, the three published Common Specifications mentioned in the introduction could be used as a model to reconsider the level of detail in some harmonised standards. Under the assumption that the level of technical detail in these published Common Specifications is satisfactory for the European Commission, producing hEN's that are less granular, more high-

level, would certainly speed up the drafting process. Nevertheless, if this less granular approach inspired by the published Common Specifications would be applied to the harmonised standards used for fire safety and security products, it could allow on the EU market products that are less safe or products offering a lower safety or security performance to the users. This less granular approach should therefore be applied with precaution.

We therefore strongly encourage the ESOs and the European Commission to reconsider openly these procedural and content approaches to speed up the delivery of hEN's.

2.2. *Insufficient digitisation*

Digitalisation of the standard development process has dramatically increased since the pandemic.

Most of the Working Group and Technical Committee meetings are now taking place online. The remaining face-to-face meetings are still necessary when difficult topics are addressed and the networking can help solving the divergences. In addition, those face-to-face meetings always offer the possibility for online participation (hybrid meetings), at least in the several TC's our members are involved.

For the drafting work itself, ISO and IEC have developed the Online Standardisation Development (OSD) platform and it is available to CEN and CENELEC TC's. Since January this year, the use of the OSD tool is mandatory for every new project within IEC. CEN and CENELEC strongly encourage their TC's to make use of it. Making it mandatory at European level could also speed up the development process or at least reduce the burden on the secretariat side of the WG's and TC's. With that in mind, we see the development of a different OSD tool for the Common Specifications would be like "re-inventing the wheel" and should be avoided.

2.3. *Insufficient alignment of draft hEN's with legal requirements*

Within the ESOs, the drafters are technical experts who have decades of experience in producing technically strong documents. The European Commission spent a lot of money to help the ESOs supporting the TC's for the development of legally strong documents. This is now proofed inefficient. Training technical experts to produce legally strong documents is probably wishful thinking.

The European Commission could delegate legal experts to the TC's for active participation in the drafting process. This would enlarge the competence in the TC's and the WG's for delivering documents that are both technically and legally strong. The European Commission is already applying that idea for the development of CRA harmonised standards where an expert from DG CNECT is present.

2.4. *Balanced stakeholder participation*

The rules of the ESOs allow for the inclusiveness of stakeholders from the society as a whole and the call for evidence acknowledges the progress made in the last years on that aspect. Having more representation of the Market Surveillance Authorities in the TC's, WG's and/or National Standardisation Bodies could certainly help delivering harmonised standards that are legally strong for placing products on the EU market. Also, having more representation of the consumer organisations in the TC's, WG's and/or National Standardisation Bodies could help delivering harmonised standards that satisfy the needs of the consumers as far as B2C products are concerned.

We therefore strongly encourage the ESOs, the European Commission, the Market Surveillance Authorities and the consumer organisations to openly envisage how their representation can be improved. In addition, the improvement in balanced stakeholder participation should be envisaged together with the goal to speed up the development process.

2.5. *Harmonised standards are part of EU law*

To our understanding, the element that makes voluntary harmonised standards forming part of EU law is the concept of Presumption of Conformity (PoC). As harmonised standards cited in the Official Journal of the EU (OJEU) do provide PoC, they produce a legal impact that expose the European Commission to a legal risk (cfr. James Elliott case). The need for PoC could perhaps be re-considered for several NLF directives and regulations. For directives and regulations that have decades of history (e.g. EMCD, LVD, RED), the level-playing field is well established, time proven, and the manufacturers have a clear knowledge of the technical requirements to comply with the essential requirements in the law. This allows the manufacturers to make their own risk assessment and use non-cited standards (e.g. latest IEC standard not cited in the OJEU) for legally placing their products on the EU market. The situation is different for new directives and regulations (e.g. CRA, AIA, ESPR) where the level-playing field still needs to be set. For those, the concept of PoC is paramount and efforts to deliver technically and legally strong harmonised standards should be maintained.

Hence, we encourage the European Commission to engage with the Market Surveillance Authorities to find a process for a kind of recognition of standards as state-of-art in relation to the corresponding directives and regulations and that would not provide PoC, so avoiding the exposure of the European Commission to legal risk. This process of recognition or the usual citation process could then be freely chosen by the TC's for each of the deliverables to be prepared in accordance with the needs of the stakeholders. This would lower the pressure on the TC's to produce legally strong harmonised standards and focus on a technically strong content.

2.6. *Europe's role as a global standard-setter*

The call for evidence acknowledges the increasing role of other regions of the world as standard-setters. We concur with that concern. However, we don't understand how disconnection of harmonised standards and Common Specifications from international standards could help with restoring Europe's role as a global standard-setter. We strongly believe that re-alignment is the way for restoral.

3. Conclusions

Euralarm agrees with the observations described in the call for evidence and puts forward concrete proposals that should help solving the issues without changes to the Standardisation Regulation. These proposals are addressed not only to the European Commission but also to the three existing ESOs and the Market Surveillance Authorities.

In case the European Commission pursues with the idea of revising the Regulation:

- the changes should have a proven impact on streamlining the standardisation process without lowering the technical quality of the deliverables;
- in particular, the harmonised standards used in our fire safety and security sector are technically very strong and ensure safety and security of the European citizens; they should not be diluted by high-level requirements in Common Specifications, to satisfy legal needs.

We are available for further discussion of these proposals.

About Euralarm

Euralarm represents the fire safety and security industry, providing leadership and expertise for industry, market, policy makers and standards bodies. Our members make society safer and secure through systems and services for fire detection and extinguishing, intrusion detection, access control, video monitoring, alarm transmission and alarm receiving centres. Founded in 1970, Euralarm represents over 5000 companies within the fire safety and security industry valued at 67 billion Euros. Euralarm members are national associations and individual companies from across Europe.

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Note: The English version of this document, GD-2025-010, is the approved Euralarm reference document.