

# **ETSI's Response to the European Commission's Call for Evidence on the revision of Regulation (EU) No 1025/2012 of the European Parliament and of the Council of 25 October 2012 on European standardisation**

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## **1. Executive Summary**

On 23 June 2025, the European Commission released the Call for Evidence on the revision of the Standardisation Regulation (EU) 1025/2012 on European standardisation<sup>2</sup> with the aim of making the standard-setting processes faster and more accessible. The European Telecommunications Standards Institute (ETSI) offers insights to improve the European Standardisation System ahead of the revision.

## **2. ETSI response**

ETSI thanks the European Commission for the opportunity given to provide input on this Call for Evidence on the revision of Regulation (EU) 1025/2012 on European standardisation which aims to address several areas of possible improvement as identified in the evaluation of said Regulation.

The Competitiveness Compass has set two objectives that are complementary and should not be seen as conflicting<sup>3</sup>. First, improve the European Standardisation System (ESS) from within by making the processes faster and more accessible. Second, strengthen the EU's role in global standard-setting processes. ETSI acknowledges these objectives and is eager to support the Commission, drawing on ETSI's European roots as well as its leading role in digital standardisation and global reach. In this context, ETSI has already submitted constructive insights and some practical solutions in response to the Single Market Strategy<sup>4</sup> and the International Digital Strategy<sup>5</sup>.

As a European Standardisation Organisation (ESO) recognised under the Regulation, ETSI operates within the framework of a close partnership with the European Commission, EU Member States, National Standardisation Bodies (NSBs), and societal stakeholders and SMEs as foreseen in Annex III of the Regulation to develop harmonised standards in support of EU legislation. For over thirty years, ETSI has been at the forefront of digital standardisation and continues to develop standards in strategic areas for the EU in ICT, Connectivity (5G/6G), and digital technologies in general such as Cybersecurity, AI, Quantum and Data. ETSI is a trusted partner in global standardisation efforts, adhering to the WTO Technical Barriers to Trade (TBT) Agreement and to the founding principles of coherence, transparency, openness, consensus, voluntary application, independence from special interests and efficiency. ETSI has developed an efficient toolbox to meet new challenges. ETSI's direct-representation model and industry-led process enhance its responsiveness to strategic digital innovation and technological deployment globally.

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<sup>1</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14511-Standardisation-Regulation-revision\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14511-Standardisation-Regulation-revision_en)

<sup>2</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012R1025>

<sup>3</sup> [https://commission.europa.eu/topics/eu-competitiveness/ess/competitiveness-compass\\_en](https://commission.europa.eu/topics/eu-competitiveness/ess/competitiveness-compass_en)

<sup>4</sup> <https://www.etsi.org/images/files/ETSIPositionPapers/ETSI-Statement-Paper-No1.pdf>

<sup>5</sup> <https://www.etsi.org/images/files/ETSIPositionPapers/ETSI-Position-Paper-No2.pdf>

In response to this Call for Evidence, ETSI wishes to highlight the following points, with a focus on the Commission's following priorities:

- a) accelerating the European standard development process;
- b) strengthening the EU's role and influence in international standardisation;
- c) improving access to standards; and
- d) enhancing inclusiveness and balanced stakeholder representation.

#### **a) Accelerating the European standard development process**

ETSI acknowledges that there is always room for improvement in accelerating the development of standards and potentially streamlining the revision cycles in certain technological sectors. The evaluation indicates that the general aim of speed has turned into a more specific one, namely the "timely availability for industry implementation by legislative deadlines". The evaluation highlights the need for greater attention to planning, anticipation, and adaptability of the whole process.

As a preliminary remark, it is important to emphasise that the pursuit of speed and timely delivery of harmonised standards in support of EU legislation must be balanced against the fundamental WTO principle of consensus-building. Other aspects including the maturity of the digital technologies covered, the inclusiveness of all stakeholders, the overall market acceptance and industry needs, as well as other external factors also play important roles. The evaluation highlights that the case law of the CJEU (e.g., Case C-613/14 also known as the "James Elliott case") had some disruptive effect that required significant adaptations of the European standard-setting processes. In any case, making the development process faster should not come at the expense of quality and inclusiveness. Sufficient time needs to be allowed for consensus-building and negotiation to ensure that harmonised standards adequately address technical and regulatory needs.

ETSI's model of direct participation is the key ingredient for fast decision making and strong commitment to any resulting standards. Industry players, societal stakeholders, research institutions, universities, NSBs, administrations of Member States and others can directly discuss with their peers and leverage fast feedback loops to find the best compromises and agreements, without going through formal procedures in national mirror committees. With that said, ETSI is continuously improving its operational workflows, working methods and quality control checks to ensure timely delivery of all its standards and other deliverables, not only harmonised standards in support of EU legislation. ETSI also works closely with other ESOs to review the standards development processes and to develop proactively practical solutions to accelerate standardisation and the timely availability of deliverables while preserving the broader integrity and robustness of the system (e.g., establishment of the ESOs-Commission Task Force). Moreover, ETSI develops different types of deliverables – including ETSI Technical Specifications – that can be used to adequately meet the objectives of the Commission, speed up the delivery of ICT deliverables and keep pace with global market dynamics, as well as fostering European competitiveness and consumer protection.

The ESS is a global reference. It combines speed, quality, and stakeholder legitimacy. While the time to develop a European standard can be considered excessive in some cases, experience shows that it can be significantly reduced under urgent circumstances. The European Commission's existing work planning tools for standardisation (Annual Union Work Programme, ICT Rolling Plan) could be optimised to identify more clearly those priorities where standardisation actions need to be accelerated. This would require ETSI – and other stakeholders such as Annex III Organisations - to engage with the Commission earlier in the pre-standardisation phase to anticipate the projected scope of any Standardisation Request (SReq).

Indeed, overall speed depends on the technical subject matter being standardised and the rules and requirements to be complied with. Competing standardisation efforts add complexity and delay and affect the coherence of European standards. While an individual SReq would probably be quicker to fulfil if the scope is clearer, narrower and better defined (subject to guidance or input received from ETSI and other standardisation experts) it may also take longer to negotiate, and risks becoming a barrier to innovative solutions and undermining consensus, inclusivity and broad acceptance of the resulting standard. Further technical work in the same area currently requires a new SReq to be redrafted and the complex negotiation and adoption procedures to be restarted from the beginning. Broadly scoped SReqs could be adapted quickly to evolving needs that were not anticipated during their initial drafting.

ETSI is ready to assist the European Commission to explore ways how to improve all relevant steps of the development of standards (including the citation of harmonised standards in the OJEU) to increase speed. This takes into consideration that, as highlighted in the evaluation, increasing the speed of citation would not be enough on its own to make the overall process sufficiently timely. In several sectors it would continue to give rise to uncertainties and costs for industries which cannot rely on the presumption of conformity. Therefore, greater attention should be paid to the following:

- Less focus on potential changes in the drafting process of standards per se, but more on the improvement of procedures around it (e.g., compliance assessment, citation).
- Improve or explore alternatives to the harmonised standards Consultants (HAS consultant) system and ensure greater (direct) involvement of technical experts from the European Commission and its specialised Agencies (e.g., cybersecurity, AI) in technical committees and working groups.
- Involve ETSI earlier in the drafting stage of SReqs (pre-adoption and notification) to speed up acceptance and rolling out. Ideally - and preferably through a systematic approach - ETSI should be consulted during the development of the corresponding legal act, so that the correct function of standards in support of the legislation can be identified and optimised at a very early stage.
- Assign SReqs adequately to ESOs considering their respective areas of technical expertise to access maximum resources and competence to develop the standards in the most efficient way. ETSI's unique strength and flexible mechanisms could be better leveraged.

In addition, there is a major concern that the currently-proposed process for developing “Common Specifications” lacks transparency and could suffer from severely limited involvement of stakeholders with a legitimate interest. There is a risk of undermining the attractiveness, legitimacy and international alignment of the European Standardisation System as a whole. Common Specifications must not be allowed to evolve into a parallel and less accountable standardisation track. Increased speed by adopting Technical Specifications from limited-consensus groups must be balanced with the requirement to preserve inclusiveness and/or any other WTO principles governing standardisation.

Considerations on whether to add a new ESO is also unlikely to speed up standards development and would not advance the two objectives mentioned in the introduction. Such a perspective could hinder the participation of societal stakeholders and SMEs, who may lack the financial resources and manpower to maintain membership and an active involvement in multiple organisations. It would also most likely lead to more overlap, complexity and conflicts, less inclusiveness and less consensus. Any resulting standards might serve special interests, create duplication and fragmentation, and undermine the system's founding principles. The current model is robust and flexible enough when adequately supported and the full range of existing tools is effectively used. In this context, ETSI's efforts to monitor legal changes in the IT sector and its enhanced work with open-source foundations to develop software complementing traditional standardisation work (e.g., Software Development Groups) demonstrate the model's adaptability.

Furthermore, sourcing standards from organisations other than the current ESOs would not alleviate two challenges recognised in the evaluation. First, the delays that can be created while “reconciling a potential stakeholder interest in cost-effective measures with the policy makers' interests in covering all potential risks” as the industry “may not be incentivised to participate in the development of a standard that could carry more costs than benefits for their businesses”. Second, the challenge presented by the shortage of European industry experts in new and strategic technological domains.

#### **b) Strengthening the EU's role and influence in international standardisation**

The evaluation confirms the positive economic impact of European standards in terms of helping companies access international markets, in strengthening EU's competitiveness and technological sovereignty, and in driving green and digital transitions. These deliverables also significantly decrease compliance costs and speed up product development in comparison to slower legislative alternatives. ETSI's global membership ensures a global promotion and improves an international uptake of European standards. ETSI has also been effective in extending Europe's influence by partnering with like-minded standards organisations in other regions developing standards in Europe that are adopted worldwide. This is a success that Europe should build upon.

Remembering that Europe does not have a monopoly on fast-paced technological innovation, ETSI would advocate for the incorporation of standards and specifications from other organisations either as Normative References in ETSI deliverables, or by the adoption of Publicly Available Specifications (PAS) from other organisations where their approval and maintenance can be managed efficiently. The PAS process enables an ETSI Partner to submit any specifications for adoption by ETSI - to then become an ETSI Technical Specification strictly in accordance with the ETSI Drafting Rules - which could serve as a first step towards becoming a European deliverable.

In both cases, any final European standards or European standardisation deliverables would be subject to the necessary consensus-building and applicable procedures of ETSI as ESO, which would ensure that they are in line with European values and interests. The Commission could make better use of any such tools as alternative pathways when harmonised standards are unavailable.

ETSI would recall that Europe has achieved a global lead in telecommunications and ICT using its Technical Specifications. Such deliverables combine the advantage of being produced by an ESO, ensuring transparency, openness, handling of intellectual property rights and a broad consensus across industry, societal stakeholders and public administrations. Coupled with ETSI's direct participation model, they offer a faster alternative to nationally adopted standards, reducing the procedural overhead needed for formal SReqs and harmonised standard development, including the stringent and unpredictable compliance assessment and the lengthy timeframe for citation. This also permits for a rapid integration of technologies that are best placed to address the global market. To accelerate the process, ETSI suggests relying on these widely accepted deliverables, which have proven their effectiveness in positioning Europe as a world leader in the telecommunications and ICT sectors.

The use of "Common Specifications" as a fallback option in EU legislation for when the harmonised standards are not available should not come at the expense of international relevance. Standards and Technical Specifications - especially those developed with a strong international dimension in strategic digital areas like cybersecurity, digital identities, quantum technology and data exchange - are better suited to promoting innovation and competitiveness. Due to the specificities of the ICT sector, it is important to develop globally-applicable standards and Technical Specifications which go well beyond exporting homegrown European standards, as this would help European industries gain a competitive advantage in market access and technology deployment in global ICT markets.

### **c) Improving access to standards**

As the evaluation document acknowledges, ETSI has made the decision to offer all of its standards for download free-of-charge. Irrespective of membership. ETSI already allows its standards and other deliverables to be consulted, downloaded and printed out from the ETSI website without charge. This policy removes financial barriers to accessing standards and maximises ETSI's impact on industry and the research community at large. As a result, ETSI standards are used globally, with more than 60 000 standards currently published overall and well over 20 million downloads on a yearly basis.

### **d) Enhancing inclusiveness and balanced stakeholder representation**

Overall, the European Standardisation System is built upon the principle of inclusiveness. ETSI's direct representation model provides reduced-cost access to SMEs, as well as Micro-Enterprises (ME), public research bodies, universities, associations, National Standards Bodies (NSBs), and governmental bodies. It is complementary to the entry points for SMEs, consumers, and regional actors provided by NSBs and European stakeholders organisations (Annex III) and allows for an opportunity for an additional representation both at the technical level and at the policy level for stakeholders ensuring that European standards reflect a wide diversity of needs. For instance, ETSI's work on the Cyber Resilience Act (CRA) demonstrates ETSI's flexibility to involve efficiently actors in the open-source community.

As pointed out in the evaluation document, Annex III organisations can have full membership in ETSI subject to a reduced fee. This membership is not different from any other, which gives them formal rights to attend and to participate in the policy-making and technical bodies, as well as in the specific bodies dedicated to the representation of societal stakeholders. ETSI also launched the '3SI programme' to increase the visibility of societal stakeholders and SMEs in standardisation and appointed a '3SI Advocate' to be a contact point. The 3SI Advocate is an ex-officio member of the ETSI Board. In ETSI, this provides a complementary path for representation of these constituencies, which are already represented in ETSI via the direct representation model.

A major barrier to effective European engagement in standardisation is the lack of sustained, long-term funding for stakeholders, not limited to non-commercial entities. ETSI's Specialist Task Force (STF) mechanism, ETSI Projects and Special Committees, as well as instruments such as Horizon Europe and the Digital Europe Programme should be leveraged to incentivise the involvement of new experts and ensure their long-term commitment. In this context, ETSI is currently preparing a dedicated education proposal, directly funded by the European Commission's Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), and developed independently of its technical committees and the formal STF process. This initiative underscores ETSI's agility and commitment to align with the Commission priorities through innovative and responsive approaches. For instance, ETSI proposes that funding of STFs should be increased to create pools of experts in new technologies and build up an ecosystem of SMEs and new stakeholders from the earliest stage. These pools of experts could be tasked to anticipate and steer future standardisation needs, carry out landscaping analyses and pre-normative work and/or offer guidance on the scope of future SReqs. This would also facilitate the conduct of early onboarding trainings and capacity building to ensure that experts in the field understand standardisation procedures and can contribute effectively. These mechanisms are adaptable and have the potential to enhance time efficiency and inclusiveness, to enable better anticipation of challenges, as well as to facilitate the accelerated production of urgently required standards in new and strategic technological areas.

While formal consultations and annual planning exercises can be beneficial to demonstrate the achievement of inclusiveness measures, they need to be made more dynamic in order to address fast-paced technological advancements. These should be met more effectively both within ESOs and throughout the drafting of SReqs. Moreover, a more active involvement of technically qualified experts from the Commission and/or its specialised Agencies in the work of technical committees would significantly enhance real-time collaboration and mutual understanding. This is especially critical in innovation-driven sectors such as AI, cybersecurity, and green technologies, where regulatory-led standardisation must remain closely aligned with industry needs, fast-paced technological innovations and real-world business challenges.

ETSI believes that greater attention should be given to contributions from Research and Academia. ETSI is investigating ways how to better recognise and reward academic contributions, comparable to academic publications. ETSI also actively identifies outputs of EU-funded research projects that could be suitable as contributions to standards. This helps bridge the gap between research, innovation, and standardisation. Incentivisation is the key to a more successful integration of the research community, notably considering the time and costs related to standardisation activities.



### 3. Conclusion

In light of the foregoing, ETSI stands ready to partner with the European Commission, build on the achievements of the past, address today's challenges, and ensure that Europe remains a global leader in shaping the standards and values underpinning the digital economy of tomorrow. As the Commission President put it, Europe already sets standards in telecoms, and it is time to replicate this success. This powerful message clearly refers to the remarkable success story of ETSI since its establishment in the late 1980s. It shows that the EU already has a proven model at its fingertips and at the heart of digital standardisation - there may not be a need to reinvent the wheel. Unlocking the full potential of the partnership between ETSI and the European Commission should not be an empty phrase. Whatever the direction, it is important to preserve the proven benefits of the existing European Standardisation System, while making better use of ETSI's full range of flexible tools.

ETSI would be pleased to provide any further information necessary.

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