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Deutsche Sozialversicherung
Europavertretung | DSV

Feedback from German Social Insurance issued 18 July 2025

Consultation of the European Commission on the impact
assessment of the planned revision of the Standardisation
Regulation

I. Preliminary remark

Harmonised European standards define technical specifications for products, services, and procedures. They play a central role in strengthening the internal market, promoting innovation, and ensuring high levels of safety and quality. Regulation (EU) No. 1025/2012 on European standardisation lays down the legal foundations for the European standardisation system and regulates the cooperation between the European Commission and the European standardisation organisations.

The European Commission intends to present a proposal to revise this regulation in the second quarter of 2026. The German Social Insurance (DSV) welcomes the goal of strengthening Europe's technological sovereignty through a more efficient, inclusive, and internationally competitive European standardisation system. However, reform should be carried out with prudence to avoid endangering proven structures of the existing standardisation system. The instrument of common specifications should be used only in clearly defined exceptional cases.



II. Opinion

The European standardisation system is based on the principle of consensus, which requires broad agreement among various stakeholders. Accelerating the standardisation processes must not call this principle into question. Therefore, DSV advocates prioritising quality over speed. Building consensus takes time – particularly in complex or technology-driven standardisation projects. While standards with limited scope can be developed quickly, those with broad impact, high levels of detail, or a connection to innovation require careful coordination and review. Legally mandated time reductions that compromise quality, coordination, and review are therefore counterproductive.

Furthermore, accelerating the process would contradict the Commission's goal of strengthening the participation of a wide range of stakeholders in standardisation. A key feature of the European standardisation system is the involvement of societal actors – including small and medium-sized enterprises, consumer organisations, public institutions, and the social insurance carriers. This participation lends standards legitimacy, practical relevance, and societal acceptance. However, the involvement of these groups is resource-intensive. Many representatives interested in occupational health and safety work in multiple committees simultaneously and carry out standardisation-related tasks in addition to their regular duties. A faster pace poses the risk of excluding less-resourced stakeholders from the process. This would be a step backwards from the stated goal of an inclusive and balanced standardisation procedure.

Especially in dynamic technological fields such as artificial intelligence, the development of new standards is urgently needed. In exceptional cases where standards are lacking or inadequate, common specifications may be used in this and certain other areas. From the perspective of DSV, however, common specifications must by no means become a standard instrument that replaces standardisation, including its established participation processes. If they are used, common specifications must be adopted based on clear, legally binding criteria and through a transparent procedure. Early and appropriate involvement of all relevant stakeholders must be ensured.

The European standardisation system shaped by Regulation (EU) No. 1025/2012 has proven itself and makes an important contribution to the harmonisation of safety standards within the EU. Adjustments – including expanded use of common specifications – should, from the DSV's perspective, be made with great care to avoid jeopardising the stability, functionality, and acceptance of the existing system.



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.