

NSAI Submission to Call for evidence for an impact assessment - Ares (2025)4981369/ Regulation 1025/2012

The National Standards Authority of Ireland (NSAI) welcomes the opportunity to provide feedback to the European Commission's Call for Evidence on the revision of Regulation (EU) 1025/2012, in advance of the upcoming Impact Assessment. We have focused key messages on areas related to those issues highlighted by the EU Commission including - speed and flexibility, inclusiveness, access & transparency, and approaches to ensure EU's position as a global standard setter.

NSAI sees the review of Regulation 1025 as an opportunity to reinforce and build on the strong existing foundation of the European Standardisation System (ESS), favouring improvements over reinvention. European standards should remain at the heart of the EU's regulatory and economic strategy.

1. Speed and flexibility - NSAI is actively supporting CEN/CENELEC in the development of new and innovative approaches to enhance flexibility (including development and knowledge sharing of SMART and OSD approaches to enhance existing processes). Wide adoption and uptake require investment and collaboration.

The Impact Assessment should thoroughly examine all types of standardisation deliverables currently available through the ESOs (including TS, TR, CWA) in order to introduce the required agility, as appropriate, whilst working within the principles of the current system. These deliverables can, and should, complement Harmonised Standards, especially in fast moving and emerging technology areas.

Integrity of the European Standardisation System – Whilst proposed use of Common Specifications has been communicated – there is a need for clarity and consistency - and this should be examined and expanded as part of the impact assessment – to avoid diminution of the ESS principles and strengths.

2. Inclusiveness – At the foundation of the ESS, wide and diverse stakeholder participation must be nurtured and enabled. NSAI supports the preservation of the Public-Private Partnership (PPP) Model. Enabling participation of representative groups in society ensures trust and acceptance, whilst maintaining the involvement of appropriate deep technical expertise ensures the development of high-quality standards which strengthen the European Single Market. Fostering inclusion requires financial investment in initiatives and investment of time to be effective, and NSAI welcomes the exploration of new and accessible opportunities and funding in this regard to support inclusion in all its forms.

3. Europe as a global standard setter - NSAI values the participation of its national experts in CEN, CENELEC, ETSI as well as in ISO and IEC Technical Committees - ensuring that European expertise has the potential to demonstrate impact internationally. In the Impact Assessment, the emphasis on maintaining strong international alignment and collaboration should be maintained and strengthened – building on the Vienna and Frankfurt Agreements to allow for integration of international and European standards.
4. Access to harmonised standards must ensure fair remuneration mechanisms for free access and, in the exploration of policy mechanisms to widen access, emphasis must be placed on maintaining copyright and I.P rights to ensure sustainability of Standards Bodies.
5. NSAI supports the further investment in initiatives that aim to develop the skills of the next generation of standards developers -including placing an emphasis on nurturing stronger synergy with research, as well as opportunities for researchers and innovators to be rewarded and suitably recognised for their participation.

In addition to this Call for Evidence, NSAI welcomes future opportunity for deeper engagement of its national experts and stakeholders in the planned public consultation.