



18 July 2025

Revision of EU Standardisation Regulation ECIS Response

We strongly support the New Legislative Framework (NLF) and a European standardisation system (ESS) built on solid foundations and driven by a public-private partnership.

We welcome that issues regarding the ESS are being addressed, and the European Commission should work with European Standards Organisations (ESOs) to improve the system.

The basic direction and focus: a clear, lean legal framework with flexibility to constantly improve and adapt to market needs at the level of the implementation. We advise against regulating too much as this may have adverse effects on the functioning, the speed and the agility of the system.

We note that this revision of Regulation 1025 comes at a point when a lot of standardisation work is needed and underway - this represents a risk if the revision is not effective.

The IT sector needs its own place to do standardisation work. This place should be market-driven, based on customer demand with processes that are favourable for the IT sector in Europe.

Currently there is competition between CEN-CENELEC and ETSI about where IT topics are addressed - this often leads to duplication of efforts and forces the IT sector to spread resources across different organisations. One solution - allow other leading IT standardisation fora/consortia such as OASIS, W3C, IETF, ECMA to be designated as an ESO. This would also enable European standards to be embedded and aligned with international standards - crucially important as the IT sector has a global footprint and fragmentation should be avoided.

We recommend a call to the ESOs, supported by the EU, to establish favourable processes and a favourable environment for the IT sector. Such a favourable environment should consider:

- Link to ISO/IEC JTC 1
- Direct participation
- Free availability of standards
- Implementability in open source (given that it is the main development model for software)
- Interaction and partnering with leading IT standardisation fora/consortia (like OASIS, W3C, IETF, Ecma) and open source foundations

Creating such an environment, e.g. with a new “pillar” for IT standardisation in Europe, will require the acceptance of the EU, perhaps with a respective amendment of Annex I of Regulation 1025.

We recommend that open source-focused organisations, including umbrella bodies and CRA type stewards of open source infrastructure, should be recognised under Annex III to strengthen



their representation in standardisation processes.

As regards common specifications, we are concerned about a lack of transparency and likely disconnect from international standardisation. Standardisation should remain a voluntary process. Common specifications will blur the lines and risk discouraging industry and other stakeholders to invest in standardisation and could become legally binding.

Alternatively, EU institutions like JRC or ENISA should participate actively and on equal grounds with all other stakeholders, in areas of strategic relevance for the EU to drive standardisation - this would create a new basis of the PPP of European standardisation and should help to prevent a deadlock where standards are not available

However a new agency is not required as it is not clear what the purpose would be for a new agency or what problem the new agency would address or solve. The European Commission already has this competence in the JRC, ENISA, today. It is a matter of empowering them to actively contribute to standards development. We note good experience with national regulators participating actively and even taking chair or editor positions.

In this context, we also support several points made in the [Joint Statement on the Commission's proposal on Common Specifications](#).