

4<sup>th</sup> April 2022

**ZVEI comments on the  
Amendment to the Regulation (EU)  
No 1025/2012 European standardisation**

## **General remarks on the European Standardisation System**

ZVEI welcomes the opportunity to provide feedback on the proposed Amendment to the Regulation (EU) No 1025/2012 European Standardisation.

In general, we are of the opinion that the European standardisation system is set up the right way. We strongly believe in the mechanism of the New Legislative Framework and don't see any necessity for general revision of our standardisation system. The NLF, with its approach of using harmonised standards to concretise abstract statutory requirements, has proven itself as an instrument for placing products on the market. Its outstanding importance also lies in its very broad application, which covers a large proportion of all non-food products. There is, however, an urgent need for a re-organisation of the process for drawing up harmonised standards.

The German electro and digital industry need international standards in which Europe's requirements and positions are sufficiently reflected. The international and European standardisation organisations should therefore be the preferred place where standards, and especially horizontal ICT standards, are developed. Broad European consensus and speed should be ensured in this process. This will enable Europe to build a strong competitive position. The European standardisation system must continue to be embedded in the international standardisation system.

## **Recommendations regarding the proposed amendment to the regulation 1025/2012**

ZVEI supports the goal of the European Commission of "good governance" for the development of harmonised European standards. The national delegation principle has proven to be a well-functioning and inclusive process to provide "good governance".

As mentioned above, it is also of utmost importance that the European standardisation system is embedded in the international standardisation system. In the international ICT standardisation system, ETSI plays an important role, especially as organisational partner within 3GPP, which is very important for the German electro and digital industry and needs to be maintained.

We therefore urge the Commission to evaluate the ETSI governance together with ETSI and find ways to adapt the processes to ensure a good governance for harmonised European standards while avoiding a de-coupling of ETSI in the international ICT standardisation system.

## **ZVEI: Electro and Digital Industry Association**

The ZVEI promotes the industry's joint economic, technological and environmental policy interests on a national, European and global level.

The sector has round about 877,000 employees in Germany. In 2021 the turnover was Euro 200 billion.

The electro and digital industry is the most innovative industry sector in Germany. One-third of the industries sales are based on new products. Every third innovation in Germany's manufacturing sector stems from solutions of this sector. More than 20 percent of all industrial R+D spending comes from this industry. Every year, the industry spends 20 billion euros on R+D, more than 6 billion euros on investments and two billion euros on training and further education.

### **Contact:**

Jochen Reinschmidt

Head of Innovation Policy

Phone: +49 30 306960 23

Email: [jochen.reinschmidt@zvei.org](mailto:jochen.reinschmidt@zvei.org)

[www.zvei.org](http://www.zvei.org)