

A Better Standardisation Is Possible – LightingEurope's Proposals

The European Commission (EC) launched the evaluation of the [Regulation \(EU\) 1025/2012](#), also known as the Standardisation Regulation, in May 2024. In September 2025, the revision of the Regulation was announced as part of the European Product Act¹. This paper presents LightingEurope proposals ahead of the review.

LightingEurope Recommendations in a nutshell

Standardisation in the European Union is facing multiple issues: lack of availability of harmonised standards, slowness of the harmonisation process, an increasing need for resources and potential decoupling from international standards.

LightingEurope has developed a set of proposals aimed at tackling these issues in view of the revision of the Standardisation Regulation as part of the European Product Act package expected by Q3 2026.

LightingEurope strongly believes in the European standardisation system; it is fundamental for manufacturers to demonstrate conformity of products placed on the Internal Market. Nevertheless, the system is not perfect, and it **could benefit from the proposals below:**

- 1. Improve the availability of harmonised listed standards:**
 - 1.1. An agreement between the International Electrotechnical Commission (IEC) and the European Commission should be found** to solve the issues stemming from the Malamud case². Without such agreement, there will be an undesired decoupling of international standardisation and European standardisation that will hamper competitiveness of European manufacturers. Additionally, decoupling will lead to duplication of work, and stakeholders involved in standardisation will have to increase the fora in which they are present.
- 2. Increase the speed of standardisation:**
 - 2.1. There is a need for clear deadlines for the EC to adopt a standardisation request** after a Regulation has entered into force and for the citation of standards in the Official Journal (OJEU).
 - 2.2. Set clear boundaries for the mandates of HAS Consultants** when assessing standards, while increasing the transparency of such mandates, as well as **setting clear rules for assessing the content of standards** against the essential requirements.
- 3. Strengthening the experts' demographics**
 - 3.1. There is a need to increase training and funding opportunities for manufacturers** and national associations **to support investments in**

¹ [European Commission 2026 Work Programme](#)

² For more information on the Malamud case see [here](#).

developing standardisation experts. This could be achieved, for example, through tax incentives for companies and national associations involved in standardisation efforts.

4. Promoting European standardisation globally

- 4.1. The EU and its member-states need better **monitoring of global standard-setting initiatives**, paired with the **identification of critical sectors** to engage in.
- 4.2. Standards need to be developed at the pace of technological and geopolitical change.
- 4.3. Avoiding decoupling from international standards will be fundamental if the promotion of European standards is a future policy and strategic objective for the EC. It will also protect and ensure the competitiveness of European manufacturers.
- 4.4. Cooperation with China remains necessary, but it should be diversified and accompanied with calls for transparency and reciprocity.

Current Issues in European Standardisation and Harmonisation

1. Availability of Harmonised Listed Standards

The European Commission's evaluation of the Standardisation Regulation ([Regulation \(EU\) 1025/2012](#)) highlighted that **the number of developed and listed harmonised standards from 2009 to 2024 has generally decreased after the Regulation's adoption**³. One of the main reasons is the delay in publication due to the Malamud case and the subsequent ISO/IEC case⁴. The result leads to a standardisation process that is still producing standards for harmonisation, but such standards have not been listed in the last two years.

On the availability of listed harmonised standards, it should also be noted that CENELEC (CLC) reported in April 2024 that **75% of submitted standards for harmonisation were not accepted**. In addition, it should be noted that there are no new listed harmonised standards since 2022 under the EMC Directive, and in 2025, under the LVD Directive, only a few European developed EN standards have been listed.

The version differences and different dates between the IEC (International Electrotechnical Commission) and CLC versions on the same topic result in confusion of the market. This confusion could lead to different manufacturers adopting different standards and methods, which could potentially hamper Market Surveillance Authorities, which will find themselves facing multiple ways of manufacturers declaring conformity.

When it comes to the unavailability of harmonised standards for Regulations or Directives using Module A (internal production control)⁵, the lighting industry has adapted with several options. There are multiple ways a manufacturer can achieve presumption of

³ European Commission: Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Fraunhofer ISI, Intellera Consulting, Trinomics B.V., Bianchini, D. et al., Evaluation study of the regulation (EU) 1025/2012 on European standardisation – Final report, Publications Office of the European Union, 2025, <https://data.europa.eu/doi/10.2873/2178479>

⁴ See [here](#).

⁵ Such as the Low Voltage Directive ([Directive 2014/35](#)) or the Electromagnetic Compatibility Directive ([Directive 2014/30](#)).

conformity. LightingEurope has developed a freely accessible guidance document to support manufacturers in drawing up the Declaration of Conformity.⁶

There are many lighting-related standards that are unavailable or delayed (not harmonised and listed). The delayed availability or unavailability of harmonised listed standards causes additional costs for manufacturers:

- In the case of delayed availability: two standard editions are necessary to meet market needs. One is the listed version for the presumption of conformity. The other is the latest version to meet state-of-the-art requirements and customer expectations.
- Unavailability of harmonised listed standards can imply the need for mandatory testing via a notified body, which has additional costs.

Both these situations can be mitigated, but this leads to undesired situations:

- Some customers ask for compliance with latest available standards, while these are not yet harmonised and listed; this potentially doubles testing cost since presumption of conformity tests AND additional tests are needed.
- Harmonised listed standards sometimes are lagging behind the technological state-of-the-art or the status of global standardisation.
- The lack of availability of harmonised standards also has an impact on Market Surveillance Authorities in their ability to carry out their duties. Without harmonised standards, they will have to carry out risk assessments that could easily be controversial vis-à-vis manufacturers or importers, thus leading to different EU law interpretations, hampering competitiveness of reputable European manufacturers.

1.1 LightingEurope Proposed Solution on the Availability of Harmonised Listed Standards

The current stalemate between IEC and the EC has aggravated the already serious delays in harmonisation.

LightingEurope supports and encourages the parties to find an agreement to solve the issues stemming from the Malamud case. Without such agreement, there will be an undesired decoupling of international standardisation and European standardisation that will hamper competitiveness of European manufacturers. Additionally, decoupling will lead to duplication of work, and stakeholders involved in standardisation will have to increase the fora in which they are present.

2. Speed of Harmonisation and HAS Consultants System

The evaluation of the Standardisation Regulation ([Regulation \(EU\) 1025/2012](#)) has demonstrated that, on average, the development time of standards in European Standardisation Organisations (ESOs) has increased⁷. At the same time, the evaluation demonstrated that the industry needs timely availability of harmonised listed standards to allow for implementation by legislative deadlines. The evaluation highlighted that two out

⁶ [Guidance and Information Paper on The Use of Lighting Product Standards in Europe 2025 - LightingEurope](#)

⁷ European Commission: Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Fraunhofer ISI, Intellera Consulting, Trinomics B.V., Bianchini, D. et al., Evaluation study of the regulation (EU) 1025/2012 on European standardisation – Final report, Publications Office of the European Union, 2025, <https://data.europa.eu/doi/10.2873/2178479>

of three phases of the harmonisation process do not have established and binding deadlines:

- There is also no deadline for the EC to harmonise and publish **the harmonised standards in the OJEU**.

In this step, it was discovered that **the timeline for harmonisation has increased significantly** from an average of four months to **1.1 years** post-Regulation. It was also noted that the EC often **rejects or publishes standards with restrictions, de facto limiting harmonisation**.

- There is no deadline for the EC to adopt and communicate standardisation requests to the ESOs.

The evaluation proved that the time for the EC adoption and communication to the ESOs **has increased**, with a duration that has increased from an average of 1 year before the Regulation **to 1.7 years** after. This is, however, partially due to the negotiation phase between the EC and the ESOs. While a longer timeline is acceptable if the negotiation between the ESOs and the EC leads to an improvement of the standardisation request, **there have been cases in which the standardisation request comes years after the Regulations have come into force**. This is the case for Regulation (EU) 2019/2015 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of light sources and Regulation (EU) 2019/2020 laying down ecodesign requirements for light sources and separate control gears. **The draft standardisation request for both Regulations was published four years after the Regulations were published in the Official Journal of the EU**.

Another issue that directly impacts the speed of harmonisation relates to the HAS Consultants System. **This Innovative Process for Harmonised Standards has created a system by which the HAS Consultant can be involved in commenting on IEC draft standards documents at the early drafting stages, but there is no direct path for these comments to reach IEC**. In CLC/TC 34, a workaround has been developed to bring these comments to IEC for further evaluating and updating the standards. The alternative would be to otherwise prepare a European amendment, lengthening the approval process and leading to further decoupling from IEC standards.

LightingEurope understands that the system is not up for review with the revision of the Standardisation Regulation, but the role and impact that the HAS Consultants System has on the timely development of standards for harmonisation must be mentioned to fully understand the current issues in European standardisation.

The HAS Consultants System was created to ensure that ESOs would develop standards aligned with the standardisation requests and with the essential requirements laid down in the regulations. While this is a solution in theory, practice might lead to different results, e.g., IEC non-EU members not accepting the HAS comments and suggestions. The immediate consequences of this are:

1. A modification of the final EN standard derived from the IEC standard;
2. An inevitable time delay.

A misalignment as such creates a hurdle for global industry which now has to comply with different versions of standards for the same product. Such misalignments could be effectively considered unnecessary trade barriers under the World Trade Organization Agreement on Technical Barriers to Trade (TBT) as referring to different standards

increases production costs, dilates the time a product will first be placed on the market and impacts consumers on the availability, choice and price of products they can purchase.

2.1 LightingEurope Proposed Solutions on the Speed of Harmonisation

In view of the publication of the European Product Act, which will include the review of the Standardisation Regulation, LightingEurope has developed a set of key proposals to improve the development of standards and harmonisation at European level.

It is fundamental to identify clear deadlines for each step of the standardisation and harmonisation processes. The ESOs have clear deadlines for the development of standards, but it is not the same for other steps of the processes.

LightingEurope is asking for:

- Clear deadlines for the EC to adopt a standardisation request after a Regulation has entered into force. In the case of Regulation (EU) 2019/2020, the request for harmonised standards came four years after the entry into force, well past its deadline for revision.
- Clear deadlines for the EC to cite a standard in the Official Journal (OJEU) and harmonise it.

2.2 LightingEurope Proposed Solutions to Improve the HAS Consultants System

The Innovative Process for Harmonised Standards, which established the figure of the HAS Consultant, has proved to be less effective than anticipated. To support it and improve its effectiveness and efficacy, LightingEurope proposes to:

- **Increase the transparency and narrow the HAS Consultants' mandate** when assessing standards. Increasing the transparency would provide better understanding for the Technical Committees (TCs), while narrowing the mandate to focus on substantial and quality issues would decrease the rejections for formal or editorial issues.⁸
- **Increase the involvement of HAS Consultants in the drafting process.** More involvement of HAS Consultants in the drafting process would avoid unnecessary back and forth between TCs and Consultants, and would reduce the misunderstandings, significantly shortening the development and assessment processes.

3. Experts' availability – Securing Succession

The availability of experts is becoming an increasingly pressing issue. Data from the evaluation of the Standardisation Regulation shows that only 38% of current experts involved in standardisation are aged 49 years or younger, and hence that 62% are 50 years or older.

⁸ It should be noted that 31% of standards rejected for non-compliance were rejected only for formal reasons.

LightingEurope conducted its own analysis in 2024 on the demographics of relevant TCs and Working Groups in standardisation bodies. The general trend identified is that many Working Groups (WGs) and TCs will see a growing depopulation of European experts in the coming years leading to less influence on standardisation in the sector. In 2024, at international level, more than 50% of the European experts were planning to retire within the next 3 to 5 years. At European level, almost 50% of the experts planned to retire within the next 3 to 5 years.

To this ageing population, **it should also be added that relevant profiles will be missing in the future, not only content experts, but also convenor-type profiles.** These kinds of profiles are highly relevant in determining the work of the different TCs and WGs. This trend of growing depopulation of European experts in the coming years will lead to less influence on standardisation, with an increasing proportion of international standardisation work being driven by other geographical regions, especially China.

3.1 LightingEurope Proposed Solutions on How to Deal with Standardisation Experts' Availability

If European leadership needs to be promoted and supported, the population will be a key factor in addressing this issue. Not only are new participants needed, but they also need to be trained, which is strictly connected to funding possibilities for manufacturers that invest resources in these types of profiles.

To solve the long-term issue of the aging of European standardisation experts, LightingEurope highlights the need to increase training and funding opportunities for manufacturers and national associations to support investments in developing standardisation experts. This could be achieved, for example, through tax incentives for companies and national associations involved in standardisation efforts.

4. EU and International Standardisation

The impact of EU standardisation efforts is linked to a decrease in participation in global Technical Committees compared to China and Japan over the last ten years. Additionally, China and the United States have been able to better align their research portfolios with the TCs compared to European countries, taking over leading roles in strategic committees and working groups at the international standardisation bodies and increasing their overall participation. These effects do not exist in a vacuum and are linked to the ageing population of European experts and to the decoupling trend from international standards that is happening in Europe as a consequence of a non-effective harmonisation process.

When it comes to improving the international effectiveness of European standardisation efforts, LightingEurope shares the proposals put forward by the recent Clingendael report⁹, among these:

- 4.1 The **EU and its member-states need better monitoring** of global standard-setting initiatives.
- 4.2 **Standards need to be developed at the pace of technological and geopolitical change.**
- 4.3 **Avoiding decoupling** from international standards **will be fundamental** if the promotion of European standards is a future policy and strategic objective for the EC. It will also protect and ensure the competitiveness of European manufacturers

⁹ Clingendael report "[Raising the Standard - How to unlock the geopolitical potential of Europe's internal market](#)"

- 4.4 Cooperation with China remains necessary, but it should be diversified and accompanied with calls for transparency and reciprocity.
- 4.5 The **EU should identify critical sectors** where it wants to be proactively engaged in international standard setting.
- 4.6 The EU has a strong incentive to engage with third countries on standardisation.
- 4.7 A transatlantic dialogue on standards is needed.

Contact

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LightingEurope is the voice of the lighting industry, based in Brussels and representing 32 companies and national associations. Together these members account for over 1,000 European companies, a majority of which are small or medium-sized. They represent a total European workforce of over 80,000 people and an annual turnover exceeding 15 billion euros. LightingEurope is committed to promoting efficient lighting that benefits human comfort, safety and wellbeing, and the environment. LightingEurope advocates a positive business and regulatory environment to foster fair competition and growth for the European lighting industry. More information is available at www.lightingeurope.org.