

EPF Feedback on the Call for Evidence: Revision of the Standardisation Regulation

The European Panel Federation (EPF), representing the European manufacturers of wood-based panels, welcomes the Commission's initiative to revise the Standardisation Regulation to accelerate processes, improve inclusiveness, and enhance access and transparency.

EPF fully supports efforts to make standard-setting more efficient and responsive to innovation cycles and policy needs. However, we caution that the pursuit of speed must not compromise the rigour, technical accuracy, and consensus-based nature of the standardisation process.

From our experience as an industry directly affected by harmonised standards under EU legislation, we would like to highlight the following points:

- **Quality and legal certainty:** While faster standard-setting is desirable, it is crucial that new measures do not inadvertently bypass necessary scrutiny or reduce opportunities for stakeholder input, especially for member based associations that require their own consultation process before feeding into the standardisation process. A rushed process may increase the likelihood of missing important requirements and resulting in non-alignment with legal requirements or create uncertainty around presumption of conformity, which would result in the process being longer due to having to go back and modify the standards to account for missed requirements, which ultimately creates costs.
- **Inclusion of industry:** Efforts to broaden participation (e.g. by SMEs and civil society) are welcome, but must be balanced with meaningful and sustained engagement of technical experts from industry. Their know-how is essential to ensure that standards remain practical, implementable, and reflective of industrial realities.
- **Transparency:** EPF supports improved access to harmonised standards. However, any changes in publication rules must preserve the financial sustainability of the standardisation system and respect intellectual property rights of standardisation bodies.
- **Governance:** We note the proposed revision of the list of European Standardisation Organisations and the possible use of alternative standard-setting routes. We urge caution in this regard. Fragmentation or duplication of efforts could undermine the coherence and trust in the system built over decades.

To conclude, while we appreciate the Commission's commitment to streamlining standardisation, we believe reforms must carefully balance speed with the need for robust procedures, technical quality, and stakeholder confidence. A predictable and legally sound standardisation framework is essential to support competitiveness, especially in sectors like ours that rely on clear and stable product rules within the Single Market.

We remain at the Commission's disposal to provide further input as the initiative develops.

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