

## Call for Evidence on the Single Market Strategy

### Introduction

The Single Market enables free movement and trade within Europe, promotes growth and development, and ensures consistent rules. Standards are an integral part of a functioning internal market area and, given the current geopolitical situation, are increasingly important for strengthening Europe's competitiveness. Harmonized standards also facilitate compliance with European legislation. Standards ensure the quality, safety, and interoperability of products and services on the market.

### The Future of the Single Market

SFS Finnish Standards, as a member of European Committee for Standardization CEN, welcomes the ambitions of the new European Commission to strengthen the Single Market.

Standardization is essential to the Single Market. To best utilise the benefits of standardization to strengthen the Single Market Strategy, we ask European Commission to:

- Consider standardization's importance to economic competitiveness and productivity
- Ensure the long-term stability of the public-private partnership
- Adopt a consistent approach to standardization across different initiatives.
- Ensure that new legislation, where relevant, reference standards through the NLF

A stronger Single Market will ensure a new era of simplification, productivity, innovation, and competitiveness. We ask that the European Commission duly consider standardization's important contribution when developing the Single Market Strategy. Specifically, we ask the European Commission to consider standardization's importance to economic competitiveness and productivity.

Strategy should duly consider the important advantage of maintaining the bottom up, consensus driven approach of the European Standardization System. To continue supporting the Single Market, it is crucial to ensure the long-term stability of the Public-Private Partnership between CEN, CENELEC, and the European Commission. This includes maintaining Regulation 1025/2012, which provides a solid legal framework for European standardization. Maintaining this framework would ensure certainty for standards developers and users. It would also allow the standardization community and the European Commission to focus on implementing the recommendations to improve the process of developing harmonised standards from the EC-ESOs taskforce that concluded in 2023. Long term discussions on the stability of the public-private partnership must also consider the provision of the necessary resources, human and economical, to maintain the sustainability of the partnership.

The Single Market Strategy should have a consistent approach on standardization among the different legislative initiatives planned under this strategy. A lack of consistency and understanding of standardization in European policies can cause confusion among stakeholders and hinder the full potential of European Standardization to support the European Economy.

The NLF should be the preferred option for new relevant legislative initiatives, as it allows for speed and the need to ensure broad input of requirements. This approach provides a regulatory framework that enables new EU policy, directives, or regulations to support innovation. Furthermore, enabling standards to be an important instrument to bring innovative solutions to the European market and strengthen the position of the EU in global competition for the best solutions for the most important problems in the world like climate change and the digital transformation. However, new product legislation for the Single Market does not always consistently apply the principles of the NLF. Consequently, the rules are fragmented, and compliance is more difficult for all parties. The Single Market Strategy should consider how to ensure the NLF is applied consistently across legislative areas.

Note: SFS Finnish Standards' position paper reflects the viewpoints of the European Committee for Standardization (CEN) and the European Committee for Electrotechnical Standardization (CENELEC).

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