

Policy Brief

Trade unions in standardisation-setting

IndustriAll Europe

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Introduction

Standards provide criteria, guidelines, or specifications to ensure that products, services, and processes are fit for their intended purpose. At the workplace, standards are important for workers because they promote safety, reliability, and quality. They help ensure that products work as expected and reduce risks. In addition, standards are used by European institutions to shape the Single Market and create a level playing field internationally as they simplify international trade by removing technical barriers and ensuring products from different countries are compatible or can be used interchangeably. All standards inevitably affect workers by defining the design and features of the means of production, the organisation of the production processes, hence workers' health and safety.



REFERENCE

REGULATION

A *regulation* is a binding legislative act. It must be applied in its entirety across the EU Member States.

HARMONISED STANDARDS

Harmonised EU standards provide the technical specifications needed for a product to respect EU law. They complement and specify the requirements of the respective EU harmonised legislation. Compliance with a harmonised standard grants the product the presumption of conformity with the relevant legislation. This allows manufacturers to access the EU market.

Traditionally, standards have been developed by and for industry. However, the last few decades have witnessed significant economic shifts. This transition, supported by advancements in digitalisation, has broadened the scope of standardisation. Today, standards extend beyond technical domains into areas like Social Responsibility (ISO 26000) or management systems (ISO 9001, 45001). These new fields increasingly touch on issues that directly affect workers, including their rights and working conditions.

Trade unions want strong legislation on work related issues done by democratically elected bodies, complemented by collective bargaining negotiated by social partners. However, there is the recognition that standardisation to deal with technical specifications in defining requirements for products, and production processes in the EU Single Market is important. Participating in these standardisation frameworks is vital for trade unions to ensure that workers' rights and interests are not overshadowed by corporate priorities and interests.

European standards vs. international standards

European and international standardisation is increasingly being used as a new form of regulation in international economic relations. The WTO's Technical Barriers to Trade Agreement (1995) elevated the role of international standards in harmonising technical specifications for goods in global markets, ensuring they do not become trade barriers.

- In Europe, many industries follow European standards (EN), developed by organisations like CEN (European Committee for Standardization), CENELEC (for electrical standards), and ETSI (for telecommunications). These standards are aligned with the needs of the EU's internal market and are crucial for cross-border trade and manufacturing. In some cases, EU legislation is "implemented" through standards, i.e. the European Commission asks CEN-CENELEC to prepare or revise standards that reflect the requirements of the specific legislation.

ISO standards, on the other hand, are global standards developed by the International Organization for Standardization.

In manufacturing, standards play a vital role across various sectors, e.g.:

- Automotive Industry: Standards like ISO/TS 16949 ensure quality management systems across the global supply chain
- Electronics: EN 55032 regulates the emissions of multimedia equipment to ensure electromagnetic compatibility
- Machinery: EN 60204-1 specifies requirements for the safety of machinery, focusing on electrical equipment design

By observing these standards, manufacturers can ensure that their products are safe, perform efficiently, and are compliant with local or international regulations.

While ISO standards aim for worldwide uniformity and best practices, EU standards are specifically tailored to the European market. A specific subset of EU standards - a collection of circa 3,600 standards called 'harmonised standards' are cited in the Official Journal of the European Union - and underpin regional (EU) laws or requirements.

Standards must be only technical

Trade unions maintain that standards should only deal with technical issues and never social ones: social rights and labour conditions should not be dictated by private technical bodies or regulatory frameworks designed for commercial and industrial efficiency, without the voice of workers.¹

Standards should never encroach upon national labour laws, collective agreements and collective bargaining.

Trade unions ensure that workers have a voice in negotiating labour conditions, wages, benefits, and health and safety at work. Technical standard-setting bodies are typically focused on product quality, efficiency, and market needs, and often do not include worker representatives or consider the human impact of their decisions. By keeping social issues out of technical standards, we ensure that decisions affecting workers' lives are made in forums where they are represented and can advocate for their interests, such as through collective bargaining or national and international labour laws (ILO).

Technical standards are often designed to harmonise processes and reduce barriers for industries, but when social issues are handled in the same way, there is a risk that social protections will be weakened to accommodate global competitiveness. For instance, a globally accepted technical standard might overlook the unique social or cultural needs of workers in a specific country, leading to one-size-fits-all approaches that don't respect labour laws or hard-won worker protections.

Social issues should be dealt with by trade unions, governments, and democratic institutions that prioritise worker welfare and human rights over technical efficiency. The negotiation of social issues requires inclusive dialogue, where the voices of workers and their representatives are central. By insisting that standards must only be technical, we can ensure that workers' rights are not subordinated to commercial interests and that fundamental labour protections are upheld in a just and democratic way.

Trade union involvement

The growing political and economic significance of standards raises questions about their legitimacy. Who decides what is standardised and how? How can we ensure standards contribute to fairness in the market without undermining workers' rights?

However, recognising that standards are a factor with an impact on working conditions, trade unions are trying to get their voices heard in the standard setting processes. Barriers to participation have been resource constraints, complex procedures, and limited access to decision-making bodies. This lack of inclusion creates a democratic deficit, allowing private interests to dominate and potentially sideline the concerns of workers and broader societal stakeholders.

¹ As an example, see Annex II: ETUC document on ISO: '*Justifications why ISO is not the appropriate place to make social standards*'.

Initiatives like the [ETUC STAND](#) project aim to address this imbalance by strengthening trade union involvement in European standardisation. In March 2024, the ETUC adopted a resolution on ‘Trade unions and the world of standardisation’, which defines more precisely the role of trade unions at EU level when it comes to standardisation. IndustriAll Europe supports this resolution. Additionally, and against this background, industriAll Europe has followed, or is currently following, specific standardisation processes that may affect the workers we represent (see Annex I).

Annex I

IndustriAll Europe's work and involvement in standardisation processes

Topic	Activity
Artificial Intelligence	<p>The implementation of the EU AI Act introduces critical new requirements for high-risk AI systems.</p> <p>The new legislation will be underpinned by new standards, developed by by the CEN-CENELEC. All high-risk AI systems entering the EU market must undergo an assessment under the Quality Management Systems, making this standard crucial for harmonising practices and protecting all stakeholders.</p> <p>The AI Act classifies the use of AI in Human Resource management as high risk, acknowledging its profound impact on the employment relationship. Ensuring that trustworthiness requirements are clearly defined in this context is essential for safeguarding worker rights and preventing biases or unfair practices.</p> <p>IndustriAll Europe is involved in the ETUC task force on developing AI Standards.</p>
Critical Raw Materials	<p>ISO has recently launched PC 348 ‘Sustainable Raw Materials’, with a plan to specify criteria for sustainable raw materials (for mineral, raw iron- and non-iron-metals), including the full upstream and downstream value chain. At the same time, EU co-legislators have approved the Critical Raw Materials Act. The European Commission has been mandated by the Act to issue a request to the European Standardisation Organisations for the development of harmonised standards. Standards on critical raw materials will have a direct impact on working conditions along raw material value chains.</p> <p>IndustriAll Europe has been appointed as an expert to the ETUC on the work related to standardisation and critical raw materials. The process has just started and the scope is still under</p>

	<p>discussion, both at international and European level.</p>
<p>Health and Safety</p>	<p>EN ISO 45001:2018 ‘Occupational health and safety management systems - <u>Requirements</u> with guidance for use’ is the third most certified standard worldwide: with over 500,000 sites certified (in 2023).</p> <p>It describes the process of setting up a management system to eliminate or decrease the OSH risks towards workers. An employer management system must fulfil a series of minimum requirements to qualify for certification. The standard is currently undergoing revision.</p> <p>IndustriAll Europe itself is not involved, but some affiliates, through their national structures, are.</p>
<p>Mechanical Engineering</p>	<p>The EU Machinery Directive (2006/42/EC) has long been the key to ensuring health and safety in the design and construction of machinery across Europe. However, with the evolution of new technologies, like artificial intelligence (AI) and advanced human-machine interaction systems, the Directive is no longer sufficient to address emerging risks.</p> <p>As of 2027, the new Machinery Regulation (2023/1230) will replace the existing Directive. This Regulation will encompass both consumer and industrial machinery, covering a wide range of equipment.</p> <p>To support manufacturers in meeting the new Regulation's safety requirements, the underpinning machinery standards are undergoing significant revisions.</p> <p>IndustriAll Europe is involved in the ETUC task force on machinery standards. By addressing safety requirements for autonomous systems, human-machine collaboration, and AI integration, the Regulation aims to ensure that technological advancements do not compromise workers' safety or wellbeing.</p>

Annex II
ETUC document: *Additional justifications why ISO is not the appropriate place to make social standards*



TOGETHER FOR A FAIR DEAL FOR WORKERS

Practical issues around the ISO standardisation system

Justifications why ISO is not the appropriate place to make social standards (i.e. technical standards, with social content) – like ISO 26000, ISO 37200, etc.

Note: ETUC supports the elaboration of technical standards. Industry needs technical standards for innovation and contractual agreements. The European institutions use standards to shape the single market of products and services. And standards are part of trade agreements. But ISO is not the appropriate place to make social standards (i.e. technical standards, with social content).

Fitness of ISO Directives, for elaborating social standards

The ISO rules have their origins in technical standard for products (and services) made “by industry” and “for industry”. Applying these rules for social standards is therefore not appropriate.

Multi-Stakeholder environment, versus bilateral or trilogue environment

The ISO rules work fine in a “multi stakeholder”, industrial environment. However, social standards are negotiated in a bilateral or trialogue environment. ISO has already recognised that specificity a long time ago, by setting up a specific consultation/adoption process for the ISO 26000:2010.

ISO standardisation process is not democratic

Many ISO-members require an annual membership/participation fee, to be able to contribute to ISO WG documents (or receive these WG documents). In a democratic process, no one must pay to vote, to influence decisions.

No balanced participation in the ISO decision-making process

Membership in national mirror committees and ISO Technical bodies are predominantly from other categories than those of social categories (it goes without saying that social standards are to be made by social stakeholders and nobody else).

In addition, no provisions are foreseen to facilitate active participation of underdeveloped countries as well as social stakeholders.

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No need to re-invent the wheels

At national, European, and international level, social standards are already elaborated by well-established organisations. There is no need to duplicate or compete with their work. Eventually, ISO can refer to their social standards.

ISO has a non-inclusive culture

The ETUC has experienced several cases where their participation – through a Liaison Status - was not welcomed. Some examples:

- In ISO/TC 260 “Human resource management”, two voting rounds were needed to get the “liaison” status.
- In ISO/TC 324 “sharing economy”, BIS voted “no” and commented that “we should not promote Trade Unions. We approve one, other countries will also demand the same” (see document ISO/TC 324 N 6).
- In november 2020, IEC/TC 70 refused the liaison status, strengthening the image that these technical bodies are “closed clubs”.

We propose an automatic access to the liaison status for societal stakeholders.

No auditing on ISO-Membership criteria

While several ISO members operate fully transparent and make every effort to be inclusive, quite a number of ISO members are not. ISO should set in place an assessment system which measures the weaknesses and strengths of their members (cfr a similar system exists for CEN and CENELEC).

Pressure on social/labour inspections systems of public authorities

Compliance (certification) of companies/organisations with ISO social standards encroaches the labour inspection systems of the public authorities: the current, independent inspections by public authorities will fade away and progressively be replaced by certificates, emitted by certification bodies (which companies/organisations pay for – or buy). This is the main reason why ISO 26000:2010 is not to be used for certification. A case in point is Italy, where UNI EN ISO 45001 is incorporated in Italian law.