



14 July 2025

(25-4506)

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Committee on Technical Barriers to Trade

Original: English

NOTIFICATION

The following notification is being circulated in accordance with Article 10.6

1. Notifying Member: <u>EUROPEAN UNION</u> If applicable, name of local government involved (Articles 3.2 and 7.2):
2. Agency responsible: European Commission EU-TBT Enquiry Point, Fax: +(32) 2 299 80 43, E-mail: grow-eu-tbt@ec.europa.eu Website: https://technical-barriers-trade.ec.europa.eu/en/home
3. Notified under Article 2.9.2 [X], 2.10.1 [], 5.6.2 [X], 5.7.1 [], 3.2 [], 7.2 [], Other:
4. Products covered (HS codes or national tariff lines. ICS numbers may be provided in addition, where applicable): cableways, personal protective equipment, appliances burning gaseous fuel, machinery, batteries.
5. Details of notified document(s) (title, number of pages and languages, means of access): Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EU) No 765/2008, (EU) 2016/424, (EU) 2016/425, (EU) 2016/426, (EU) 2023/1230, (EU) 2023/1542 and (EU) 2024/1781 as regards digitalisation and common specifications; (57 page(s), in English), (12 page(s), in English) Link to notified document(s) and/or contact details for agency or authority which can provide copies upon request: https://members.wto.org/crnattachments/2025/TBT/EEC/25_04592_00_e.pdf https://members.wto.org/crnattachments/2025/TBT/EEC/25_04592_01_e.pdf https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025PC0504 European Commission EU-TBT Enquiry Point Fax: + (32) 2 299 80 43 E-mail: grow-eu-tbt@ec.europa.eu The text is available on the Website: https://technical-barriers-trade.ec.europa.eu/en/home
6. Description of content: The proposal aims to rationalise and digitalise economic operators' obligations for the concerned Directives and to align the existing fall-back option to harmonised standards uniformly. This proposal includes: - The specification that the EU declaration of conformity, or a similar document, must be drawn up in electronic form and made accessible through an internet address or machine-readable code when that declaration needs to accompany a product;

- The addition of a 'digital contact' as information to be indicated by manufacturers on the products which are placed on the market in order to facilitate communication between economic operators and national authorities;
- The specification that the instructions accompanying products may be provided in electronic form, with the exception of safety information which should be provided on paper or marked on the product for consumers;
- The amendment of reporting obligations to national authorities that require a 'paper or electronic format' to 'electronic form' only;
- The insertion of an obligation for exchanges by electronic means between the economic operators and the competent authorities;
- The introduction of a provision on common specifications to benefit from the use of presumption of conformity with essential requirements in the absence of harmonised standards;
- An obligation to provide the information contained in the EU declaration of conformity and instructions on the digital product passport, when the product is subject to other Union legislation that requires the use of such a digital product passport.

7. Objective and rationale, including the nature of urgent problems where applicable:

In its Communication on 'Long-term competitiveness of the EU: looking beyond 2030', the Commission stressed the importance of a regulatory system that ensures objectives are reached at minimum costs. To that end, it committed to a dedicated effort to rationalise and simplify reporting requirements and administrative burdens, with the ultimate aim of reducing such requirements by 25%, without undermining the related policy objectives. Reporting requirements play a key role in ensuring the correct enforcement and proper monitoring of legislation. The costs of reporting are overall largely offset by the benefits they bring, in particular as regards monitoring and ensuring compliance with key policy measures.

However, reporting requirements can also impose a disproportionate burden on stakeholders, particularly SMEs and micro-companies. The accumulation of these requirements over time can result in redundant, duplicate or obsolete obligations, inefficient frequency and timing, or inadequate methods of collection. Moreover, the Commission promotes the 'digital by default' principle in its Digital Strategy/Better regulation to support digital transformations, facilitating digital-ready policies that take into account the fast-evolving world of digitalisation and technology, and are digital, interoperable, future-proof and agile by default.

Nevertheless, there are still various pieces of EU legislation that provide for the use of paper format. Removing references to paper format would also force public authorities to rethink the ways they process submissions or reporting by companies. Streamlining such submissions and reporting by promoting digital-by-default would create new incentives to invest in data collection and processing with eGovernment solutions that could pave the way to a document-free Single Market based on interoperable structured data and the once-only principle.

Moreover, taking into account that in 2024, no less than 94% of EU households had access to internet, the paper format of instructions for use accompanying products under the scope of the Directives is outdated and not aligned with current technologies, consumer habits or green objectives. Consequently, manufacturers should be able to choose a digital format for instructions for use. However, where manufacturers choose to provide instructions for use in digital format, the safety information (including any parts of the instructions for use deemed imperative for safety) should still be provided in paper format to protect the safety of consumers. Moreover, end-users should be able to obtain a paper copy of the instructions upon request – at the time of purchase and for a certain period of time after purchase.

The present proposal's objective is also to align the alternative option in legislative acts which do not provide for any alternative option to harmonised standards. The alternative option is to be implemented in a uniform manner as regards definition, legal effect, the conditions under which that alternative option may be adopted and adoption procedure. The initiative on common specifications is fully in line with the need referred to above and

<p>aims to simplify the life of businesses that must comply with one or more product-specific health and safety requirements, as enshrined in sectoral regulations that make use of harmonised standards. ; Consumer information, labelling; Harmonization; Cost saving and productivity enhancement</p>
<p>8. Relevant documents:</p> <p>Regulation (EC) No 765/2008 of the European Parliament and of the Council of 9 July 2008 setting out the requirements for accreditation and market surveillance relating to the marketing of products and repealing Regulation (EEC) No 339/93 (OJ L 218, 13.8.2008, p. 30, ELI: http://data.europa.eu/eli/reg/2008/765/oj)</p> <p>Regulation (EU) 2016/424 of the European Parliament and of the Council of 9 March 2016 on cableway installations and repealing Directive 2000/9/EC (OJ L 81, 31.3.2016, p. 1, ELI: http://data.europa.eu/eli/reg/2016/424/oj)</p> <p>Regulation (EU) 2016/425 of the European Parliament and of the Council of 9 March 2016 on personal protective equipment and repealing Council Directive 89/686/EEC (OJ L 81, 31.3.2016, p. 5, ELI: http://data.europa.eu/eli/reg/2016/425/oj)</p> <p>Regulation (EU) 2016/426 of the European Parliament and of the Council of 9 March 2016 on appliances burning gaseous fuels and repealing Directive 2009/142/EC (OJ L 81, 31.3.2016, p. 99, ELI: http://data.europa.eu/eli/reg/2016/426/oj)</p> <p>Regulation (EU) 2023/1230 of the European Parliament and of the Council of 14 June 2023 on machinery and repealing Directive 2006/42/EC of the European Parliament and of the Council and Council Directive 73/361/EEC (OJ L 165, 29.6.2023, p. 1, http://data.europa.eu/eli/reg/2023/1230/oj)</p> <p>Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC (OJ L 191, 28.7.2023, p. 1, ELI: http://data.europa.eu/eli/reg/2023/1542/oj)</p> <p>Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC (OJ L, 2024/1781, 28.6.2024, ELI: http://data.europa.eu/eli/reg/2024/1781/oj)</p>
<p>9. Proposed date of adoption: 2026</p> <p>Proposed date of entry into force: 20 days from publication in the Official Journal of the EU</p>
<p>10. Provision of comments</p> <p>Final date for comments: 12 October 2025 (90 days from notification)</p> <p>[] 60 days from notification</p> <p>Contact details of agency or authority designated to handle comments regarding the notification:</p> <p>European Commission, EU-TBT Enquiry Point, Fax: + (32) 2 299 80 43, E-mail: grow-eu-tbt@ec.europa.eu</p> <p>The text is available on the EU-TBT Website : https://technical-barriers-trade.ec.europa.eu/en/home</p>