

Policy paper on Omnibus IV (Paper vs. Digital documentation & Common Specifications)



Paper vs. Digital documentation

We acknowledge the Commission's intention to promote digital user manuals as a means to reduce paper consumption, lower costs, and minimise CO₂ emissions. While digital instructions and safety information are already common practice, current legislation still obliges the home appliance sector to provide printed instructions and safety information with each unit. We therefore welcome any move that grants manufacturers the choice between digital and paper formats.

However, the current proposal does not yet constitute a genuine simplification for our sector (home appliances are consumer products). It continues to mandate that safety information be provided in paper form with each product unit. This requirement would necessitate separating safety information from general usage instructions, a process that is not only burdensome but also creates legal ambiguity.

Allowing a fully digital manual, including safety instructions, could yield significant cost savings, estimated between €40 up to €170 million. In addition, from an environmental perspective, avoiding the printing of millions of unnecessary pages would be a critical step forward.

Fully digital manuals come with several advantages. They ensure barrier-free access, support the integration of videos and hyperlinks to additional resources, and offer the convenience of being impossible to lose. We fully support giving consumers the option to request a physical copy of the documentation if explicitly desired. We also agree to limit this option to the first six months following the purchase of a product.

To fully unlock the potential for simplification, we believe that safety information can be delivered electronically, potentially in even more user-friendly formats, such as animations. But keeping in mind the safety of the consumer as the utmost objective, this should be done in a second phase.

Last but not least, notes the omission of two relevant pieces of legislation from the list of omnibus laws: the General Product Safety Regulation and the Energy Label Regulation. The latter, in particular, holds substantial potential for cost and environmental savings.



Under the current EU E-label Regulation 2017/1369, a printed, full-colour energy label must be provided with each appliance placed on the market, even though only a small fraction of appliances are physically displayed in stores, where the label is actually needed. The average cost of producing and handling a single energy label is 0.20€. If we estimate that only 1 in 500 printed labels are actually used as intended, this results in an effective cost of €100 per used label ($€0.20 \times 500$). Approximately 100 million labelled home appliances, cooling, and heating units are introduced to the EU market each year. This results in significant waste of printed colored paper that leads to costs of at least 20 million euros, only for our sector.

Given that energy labels are already available digitally via the EU EPREL database, on manufacturers' websites, and in all online appliance listings, we see strong potential for allowing energy labels to be provided in digital format only. This should be explored as a viable simplification opportunity with significant impact.

In summary

- The proposal represents a step in the right direction, enabling both cost savings and a reduction in CO₂ emissions.
- However, it does not yet offer true simplification from an operational perspective. Companies would still be required to separate safety information from usage instructions, creating additional workload and legal uncertainty.
- The digitalisation of safety instructions should be clearly foreseen as a next step, allowing for more effective and user-friendly communication.
- The scope of the omnibus should also be expanded to include the General Product Safety Regulation (GPSR).
- We strongly recommend unlocking the full potential of the digital energy label by amending Regulation 2017/1369 without delay.



APPLiA's suggested amendments to the Omnibus

IV

Amendment 1

Include Regulation (EU) 2023/988 in the Omnibus

Amendment 2

Text proposed by the Commission

Whereas (8)

Taking into account that in 2024 no less than 94% of EU households had access to the internet, the paper format of the instructions for use accompanying the products under the scope of the Directives concerned is outdated and is not aligned with the current technologies, the practice of consumers, nor with green objectives. Consequently, the possibility of a digital format of the instructions should be introduced in the Directives. This will allow manufacturers to provide instructions in digital format, if they wish to do so. Where manufacturers choose to provide instructions in digital format, in order to still protect the safety of consumers, the safety information, including instructions that have an impact on product safety, should be provided in paper format or marked on the product. Moreover, end-users should be able to obtain a paper copy of the instructions for use or safety information, upon request, at the time of the purchase and for a certain period of time after their purchase.

Amendment

Whereas (8)

Taking into account that in 2024 no less than 94% of EU households had access to the internet, the paper format of the instructions for use accompanying the products under the scope of the Directives concerned is outdated and is not aligned with the current technologies, the practice of consumers, nor with green objectives. Consequently, the possibility of a digital format of the instructions shall be introduced in the Directives. This will allow manufacturers to provide instructions in digital format, if they wish to do so. Where manufacturers choose to provide instructions in digital format, in order to still protect the safety of consumers, the safety information, including instructions that have an impact on product safety, should be provided in paper format **upon request by the consumer. The possibility of a digital format shall be introduced in the relevant legislation [...].** Moreover, end-users should be able to obtain a paper copy of the instructions for use or safety information, upon request, at the time of the purchase and for a certain period of time after their purchase. **However, the Commission should investigate whether digital safety information**



can be equally or even more effective. This investigation should be part of a report to be published by the Commission within three years.

The Commission shall revise the legislation amended by this Omnibus legislation accordingly [2014/53/EU, 2023/1230/EU, 2023/988/EU [...]]

Amendment 2

Text proposed by the Commission

Article 7

Entry into force and application

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*

Article 4, points (2)(b) and (3), shall apply as of 5 March 2026.

This Regulation shall be binding in its entirety and directly applicable in the Member States in accordance with the Treaties.

Amendment

Article 7bis

Review

The Commission shall within three years of the entry into force of this [Regulation/Directive], publish a report on the effectiveness of digital safety information of products intended to be used by consumers. The Commission shall review this [Regulation/Directive] in the light of that report and shall publish the results of this review, including, if appropriate, a draft revision proposal by [date five years after entry into force]



Common Specification

The European Union's conformity system for household appliances has for decades relied on the robust system of the current New Legislative Framework (NLF), with legislation defining legal obligations, and harmonised standards providing the technical means to demonstrate compliance

The recent **Omnibus IV** legislative package would fundamentally alter this approach by introducing **Common Specifications across 22 product-related regulations and directives**. The suggested approach would empower the European Commission to directly adopt all the technical specifications and detailed technical methods, and thereby completely **bypass the standardisation bodies and processes**. This represents a significant departure from the New Approach that has underpinned the growth and success of the EU single market for decades.

The Commission's proposal states that Common Specifications should only be used if standardisation efforts fail. We agree with having such a fallback mechanism; however, stronger safeguards are needed to ensure that common specifications are used as a last resort. Common specifications should only be introduced if standardisation has demonstrably failed within a defined timeframe, such as two years.

Also, the Commission should be required to always first request and attempt to establish the standards through CEN and CENELEC. This concept is already realised in Regulation (EU) 2023/1230 ('Machinery Regulation'), which has recently introduced Common Specifications.

We underline that the Machinery Regulation has been adopted through the ordinary legislative procedure and thus provides a solid and legitimate basis upon which to build. Below, we therefore propose the following text copied from the 'Machinery Regulation and amended as a constructive solution aligned with the Commission's objectives.

We firmly believe that, for reasons of democratic integrity, this Omnibus Regulation must ensure that Common Specifications are subject to the same rigorous principles as traditional standard development, namely, reliability, expertise, openness, transparency, and consensus. These principles are essential to uphold the credibility and effectiveness of EU technical regulation, which underpins a well-functioning internal market, safeguards consumer safety, and supports environmental protection.



In summary

- The introduction of common specifications represents a departure from the successful approach that was created with the New Legislative Framework (NLF).
- Stronger safeguards are needed to ensure that common specifications are used under well-defined, exceptional cases as a last resort, as stated by the Commission.
- Such safeguards are already well formulated in Regulation (EU) 2023/1230 ('Machinery Regulation') and would, with some further adjustments, meet the objectives of "last resort" spelt out by the Commission.

APPLiA's suggested amendments to the text of the Omnibus IV

Amendment

Text proposed by the Commission

The Commission may, through implementing acts, adopt common specifications that enable compliance with the essential requirements set out in [specific legal reference] in any of the following cases:

(a) requirements set out in [specific legal reference] are not covered by harmonised standards, or parts thereof, the references of which have been published in the Official Journal of the European Union;

(b) requirements set out in [specific legal reference] are covered by harmonised standards, or parts thereof, the references of which have been published in the Official Journal of the European Union, but application of those standards or parts thereof result in non-compliance of a product with the essential requirements set out in [specific legal reference]; or

(c) where the Commission considers that there is a need to address an urgent concern with regard to non-compliant subsystems and safety components.

Amendment

The Commission may, through implementing acts, adopt common specifications that enable compliance with the essential requirements set out in [specific legal reference] in the following cases:

(a) The Commission has requested, pursuant to Article 10(1) of Regulation (EU) No 1025/2012, one or more European standardisation organisations to draft a harmonised standard for the essential health and safety requirements set out in [specific legal reference] and:

(i) the request has not been accepted without sound and objective reasons for that rejection; or



(ii) the harmonised standards addressing that request are not delivered within at least two years or the deadline set in accordance with Article 10(1) of Regulation (EU) No 1025/2012; or

(iii) the harmonised standards do not comply with the request; and

(b) no reference to harmonised standards covering the relevant essential health and safety requirements set out in Annex III has been published in the Official Journal of the European Union in accordance with Regulation (EU) No 1025/2012 and the Commission has justified the reasons for not publishing the reference vis-à-vis the Committee of Standards referred to in Article 22 of Regulation (EU) No 1025/2012 and that Committee has endorsed the justification applying Article 5 of Regulation (EU) No 182/2011.

Those implementing acts shall be ***developed in accordance with the principles of Annex II 3(a),(b) and (c) of Regulation (EU) 1025/2012*** ***and*** adopted in accordance with the advisory procedure referred to in Article [reference of the same act].

Justification



These amendments are directly copied from Article 20(3) of Regulation (EU) 2023/1230 on machinery products ('Machinery Regulation'), which is reproduced below. They have already been agreed upon by the co-legislators to ensure the necessary safeguards are in place.

In addition, APPLiA proposes the following:

- To ensure appropriate checks and balances, the Committee on Standards should be formally involved in the process;
- During the development of common specifications, explicit reference should be made to the principles of "openness to all interested parties," "consensus," and "transparency," as outlined in Annex II, points 3(a) to 3(c) of Regulation (EU) 1025/2012. These principles are also in line with WTO recommendations for good standardisation practices.

Finally, APPLiA considers that "urgency" is too vague and subjective a criterion to justify the initiation of a common specification procedure. As such, it should not be retained as a valid trigger for launching the process.

Regulation (EU) 2023/1230 of the European Parliament and of the Council of 14 June 2023 on machinery and repealing Directive 2006/42/EC

Article 20

Presumption of conformity of products within the scope of this Regulation

1. (...)
2. (...)
3. *The Commission may adopt implementing acts establishing common specifications covering technical requirements that provide a means to comply with the essential health and safety requirements set out in Annex III for products within the scope of this Regulation.*

Those implementing acts shall only be adopted where the following conditions are fulfilled:

(a) The Commission has requested, pursuant to Article 10(1) of Regulation (EU) No 1025/2012, one or more European standardisation organisations to draft a harmonised standard for the essential health and safety requirements set out in Annex III and:

(i) the request has not been accepted; or

(ii) the harmonised standards addressing that request are not delivered within the deadline set in accordance with Article 10(1) of Regulation (EU) No 1025/2012; or

(iii) the harmonised standards do not comply with the request; and



(b) no reference to harmonised standards covering the relevant essential health and safety requirements set out in Annex III has been published in the Official Journal of the European

Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 48(3).

Reference contact

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