

INPUT to INI Report on *A new legislative framework for products that is fit for the digital and sustainable transition*

The New Legislative Framework (NLF) is **the backbone** of EU product legislation, ensuring the uniform application of rules, definitions, and concepts. It enables products to freely circulate in the Single Market, reaching consumers while upholding maximum safety standards and high environmental protection. Home appliance manufacturers are well-acquainted with EU product legislation and the NLF, and have actively contributed for decades to standard-setting and regulatory processes, offering our expertise in safety, circularity, durability, and interoperability. We believe that while the **NLF remains largely fit for purpose**, targeted adjustments are needed to align it with technological advancements, digitalisation, and new regulatory concepts.

With a view to providing input IMCO Committee's Own-Initiative Report on "*A New Legislative Framework for Products Fit for the Digital and Sustainable Transition*," we are sharing our recommendations on the necessary **adjustments to ensure the framework remains robust, future-proof, and aligned with digital and sustainability goals**.

While not explicitly referenced in the NLF, one of the most important aspects of product legislation is **setting standards**. Standards play an integral role in product legislation, covering various requirements. While legislation establishes general obligations, standards define technical and conformity aspects, ensuring clear and uniform compliance requirements for manufacturers. However, it is crucial that these standards are upheld and published in a timely manner in the Official Journal of the European Union (OJEU).

The rise of e-commerce has also increased the presence of non-compliant products in the EU market. To address this, the NLF should reflect the **challenges of online sales**, ensuring that market surveillance and enforcement mechanisms are strengthened.

At the same time, digitalisation presents opportunities to improve compliance and information accessibility. The adoption of digital tools can enhance efficiency by **digitising manuals and safety instructions**, making product information more readily available to consumers and stakeholders online, reducing costs and improving compliance.

In order to ensure that product legislation supports the circular economy, a more coherent approach is needed. Recent legislative initiatives, such as the Ecodesign for Sustainable Products Regulation (ESPR) promoting repairability and durability, have begun addressing this. However, to build a successful framework that truly supports circularity and in the view of the upcoming Circular Economy Act, the NLF should **provide guidance** to ensure clear and consistent definitions across all legislative texts.

The targeted recommendations are found below



Recommendations:

- **Recognise online marketplaces as economic operators.** Over 4 billion packages are delivered to the EU with many of them being non-compliant. For example more than 400 products coming outside of the EU were listed under the "electrical appliances " category in the EU's Safety Gate system, with over 200 posing significant risks such as burns or electric shock. This puts European manufacturers at a disadvantage, distorting the level playing field and posing risks to consumer safety. Many traders on those platforms do not have a legal entity within the EU, making enforcement more difficult. Including online marketplaces in the definition of economic operators in the NLF, online marketplaces would resume greater responsibility and ensure more effective compliance.
- **Set maximum deadlines for standardisation requests and objections.** The delayed publication of harmonised standards in the OJEU remains a major issue. The delays are undermining industry competitiveness, weakening the level playing field, and limiting the ability of authorities to enforce compliance. The result is higher levels of non-compliant products circulating across Europe, putting EU companies at a disadvantage. Without harmonised standards the manufacturers rely on other international standards or expensive certification. Standards also enable effective self-assessment by allowing a presumption of conformity, removing the need for costly and time consuming third-party verification.
- **Ensure effective and appropriate use of the Digital Product Passport.** The implementation of the DPP must be efficient, minimising burdens on businesses while effectively supporting the circular economy. The DPP should remain a tool rather than an end in itself, avoiding unnecessary information overload that could hinder its usability and effectiveness. It is important to consider that establishing the DPP requires significant investments while effective digital tools are already established.
- **Permit electronic formats for safety and user documentation.** Safety-related documentation such as user manuals and declarations of conformity should be allowed to be displayed to users only in electronic formats. Home appliance manufacturers are spending up to 170 million euros on paper manuals while 1 in 5 users look for the information on their website. Allowing to display information digitally and removing the paper requirement would significantly reduce costs as well as the environmental footprint. Keeping in mind that the information is already available online and would require additional resources.
- **Harmonise the definitions of "remanufacturing," "refurbished," "maintenance" with the ESPR.** The last legislative mandate introduced several laws promoting sustainable consumption and the circular economy, bringing forward new concepts and definitions. The definitions of "remanufacturing," "refurbished," and "maintenance" should be harmonised in alignment with the Ecodesign for Sustainable Products Regulation to avoid regulatory fragmentation and ensure a uniform application of sustainability requirements across the entire supply chain.

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