

Position Paper

on the European Parliament position on the Omnibus IV on Digitalisation and Common Specifications

Executive summary

This position paper proposes three targeted adjustments to the Omnibus IV compromise text to ensure that the rules for digital product information remain future-proof, proportionate, and consistent with the EU's simplification goals.

1. Digital EU Declaration of Conformity (DoC)

Requiring the DoC to be accessible "*directly*" via a one-click link, and discouraging *any* intermediate navigation steps, creates unnecessary rigidity—especially for modular or configurable product portfolios. Such wording would force the creation of numerous unique URLs or QR codes, adding administrative burden and contradicting Omnibus IV's reductive intent. Allowing a governance-controlled landing page with a clear search function still guarantees availability, authenticity, and free access, while enabling efficient and technically neutral documentation management. The terms "directly" and "no intermediate steps" should therefore be removed.

2. Timelines and Communication Channels for Paper on Request

A harmonised 6-month request period for both B2C and B2B users offers clarity and consistency. To reflect operational realities across multilingual and product-specific documentation, the fulfilment period should be extended to 30 calendar days. Mandatory telephone access, however, would impose verification problems and disproportionate costs—especially for SMEs—without adding value in professional contexts. "Accessible means of communication" should therefore be defined as web forms and email, with telephone support remaining optional for consumer-facing sectors.

3. Paper Format Requirements for Professional Equipment

The current draft triggers paper obligations when a product "could also be used by consumers," which risks unintentionally treating professional machinery as consumer goods. This runs counter to the simplification goals by adding unnecessary administrative burden. Paper requirements should instead follow the established legal principle of *intended use*, as defined in the Machinery Regulation and the New Legislative Framework. This ensures legal clarity and recognises that trained professional users benefit more from digital documentation, which is easier to update and manage.

Horizontal Change—Digital EU Declaration of Conformity (DoC)

To maintain a future-proof, proportionate and genuinely simplification-oriented regulatory framework, the horizontal provisions governing digital access to the EU Declaration of Conformity (DoC) should be adjusted by removing the term “directly” and by deleting the recital language suggesting that authorities should not have to “navigate through intermediate steps.” These elements unintentionally introduce rigidity into the system and undermine the very objectives the Omnibus IV package seeks to achieve.

From a proportionality and simplification standpoint, requiring a strict “direct” one-click link to each individual DoC is incompatible with the operational realities of manufacturers managing large, modular and configurable product portfolios. Such a requirement forces manufacturers to generate and maintain a unique URL or QR code for every variant, thereby multiplying documentation endpoints and increasing the risk of outdated links at every product update. This approach contradicts the simplification goals explicitly associated with Omnibus IV, which seeks to reduce administrative burdens rather than exacerbate them.

A governance-controlled landing page with a clear, intuitive search function (e.g., by model, type or serial number) is not only equally effective for authorities and users but frequently more reliable. Centralised access points strengthen version control, ensure alignment of product data, and improve auditability compared to dispersed deep links that are harder to maintain consistently across long product lifecycles. Importantly, IMCO’s intention to avoid “burdensome access paths” can still be fully met through functional UX minima—such as prohibiting logins, personal-data collection or operator-specific apps—without prescribing a single mandatory design pattern.

From a legal and technical perspective, the “no intermediate steps” formulation is effectively a UX design prescription, not a regulatory necessity. Such prescriptive wording risks becoming obsolete as digital access technologies evolve. The essential regulatory objectives—availability, integrity, authenticity and free/no-login access—are fully ensured by the safeguards already reflected in the compromise text, complemented by the robust enforcement powers available to market surveillance authorities. There is no added compliance value in banning landing pages; instead, such a prohibition constrains legitimate, efficient digital documentation strategies.

Allowing manufacturers to use a stable, well-maintained landing page also supports bureaucracy reduction in practice. It avoids the creation of duplicative access points, minimises update errors, and aligns with operational digital-by-default workflows—all of which mirror the simplification rationale set out by the Commission and supported by industry stakeholders.

These adjustments are particularly urgent for products covered by Regulation (EU) 2023/1230 on machinery. Although the Regulation allows the Declaration of Conformity (DoC) to be provided in either paper or digital format, neither the Parliament nor the Council have foreseen any transitional period for this requirement. As a result, once the Regulation applies in January 2027, manufacturers would be required to comply immediately with the mandatory digital DoC. This situation differs from the

transitional measures foreseen for other product Regulations and Directives and places machinery manufacturers at a clear competitive disadvantage. Introducing a transitional period of at least 24 months for the mandatory electronic DoC would ensure fair treatment, support orderly implementation, and avoid overburdening manufacturers who have already invested significantly in preparing for compliance with the Regulation under the existing requirements.

Proposed Approach to Timelines and Communication Channels for Paper-on-Request Obligations

A coherent and proportionate framework for paper-on-request obligations requires clear, uniform timelines and communication channels that support end-users while avoiding unnecessary administrative burdens for manufacturers. To this end, we propose that both consumer (B2C) and professional (B2B) users retain a 6-month period during which they may request paper instructions or safety information. This harmonised timeline offers legal clarity, simplifies implementation across product categories, and ensures equal access to paper based information for all end-users without expanding administrative obligations beyond what is operationally feasible.

At the same time, the manufacturer fulfilment deadline should be extended beyond the currently envisioned 15 working days. A longer period—such as 30 calendar days—reflects the practical realities of producing, verifying, and distributing paper documentation, especially for products requiring multilingual or product-specific content. This adjustment maintains user rights while avoiding unrealistic time pressures that may disproportionately affect SMEs and Small Mid-Caps.

A further essential refinement concerns the channels through which requests may be submitted. While telephone contact can play an important role in consumer-facing contexts, particularly for individuals at risk of digital exclusion—as highlighted in Recital 8b—it should not become a mandatory communication channel for all product categories. Telephone-only requirements introduce significant verification challenges, as purchase and product identity are difficult to confirm via voice communication. This increases the risk of misuse, such as large-scale, unjustified mail-outs of printed manuals, and may compromise the integrity of compliance processes.

Moreover, mandating telephone handling across all sectors would require manufacturers to establish and staff call-centre structures, generating a disproportionate cost burden, especially for SMEs/SMCs—directly contradicting the simplification and competitiveness goals of the Omnibus IV package.

A workable and balanced alternative is to define “accessible means of communication” as including web forms and e-mail, which are inherently traceable, verifiable, and manageable across diverse product portfolios. Telephone contact should remain optional and if at all primarily relevant for B2C products, not required for professional-use-only equipment. This distinction is particularly important in B2B environments, where equipment is typically operated by trained professionals, often following formal on-site commissioning, and where telephone-based verification is not only impractical but also vulnerable to abuse.

Clarifying the Paper-Format Obligations for Professional-Use Products

The current compromise text introduces a significant challenge by suggesting that, even when a product is primarily intended for professional use, manufacturers would nonetheless be required to provide safety information and instructions in paper format if the product “could also be used by consumers.” This formulation sets an extremely low and highly subjective threshold: almost any piece of professional equipment could, in theory, be used by a consumer under exceptional circumstances. As a result, this wording risks reclassifying a wide range of professional machinery as de-facto consumer goods, generating unnecessary obligations for manufacturers and undermining the efficiency gains intended by the Omnibus IV package.

To avoid such unintended consequences, the trigger for paper-format obligations should be anchored firmly in the concept of “intended use”, as defined in EU product safety legislation—most notably the Machinery Regulation (EU) 2023/1230 and the New Legislative Framework. These instruments consistently distinguish products based on their designed purpose, expected user group, and distribution channels, creating a stable and predictable legal environment for manufacturers and market surveillance authorities.

This refinement is essential for maintaining legal certainty. The intended-use principle has long served as the backbone of EU product compliance, shaping design parameters, labelling strategies, and the structure of user instructions across numerous sectors. By contrast, the proposed “could be used by consumers” test is overly broad, blurs the line between B2B and B2C products, and introduces ambiguity that complicates enforcement and increases administrative overhead without improving safety outcomes.

Moreover, applying paper-format obligations indiscriminately to professional equipment would impose unnecessary bureaucracy, counteracting the simplification goals of the Omnibus IV package. Professional machinery typically operates in controlled environments, handled by trained personnel who already receive comprehensive operational guidance during commissioning or formal training sessions. For such products, digital instructions are not only sufficient but are more practical, easier to update, and more aligned with established industrial workflows.

Conclusion

To deliver on the EU’s objective of reducing administrative burdens while ensuring high standards of transparency and safety, Omnibus IV must avoid overly prescriptive design requirements and unfocused obligations that inadvertently expand compliance duties without improving outcomes.

Removing the term “directly” and the “no intermediate steps” recital, adopting a unified 6-month paper-request period with a realistic fulfilment timeline, and anchoring paper-format obligations firmly in intended use will collectively create a practical, coherent, and technologically neutral framework.

These adjustments safeguard user rights, support effective market surveillance, prevent disproportionate burdens on industry—especially SMEs and SMCs—and uphold the core vision of a simplified, digital-by-default Single Market.

EUnited is the European association representing manufacturers of municipal equipment, professional cleaning machines and vehicle wash systems. It brings together more than 60 member companies in 16 European countries.

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