

## ZVEI-Position

Comments on the proposals for a directive and a regulation as regards the digitalisation and alignment of common specifications – COM(2025) 503 and COM(2025) 504

### Introductory remark

ZVEI welcomes the European Commission's approach to address the digitalisation of information for use through the Omnibus IV package and the published Proposals [COM\(2025\) 503](#) + [Annexes](#) and [COM\(2025\) 504](#) + [Annexes](#). The proposals represent an important step towards enhancing user-friendliness, sustainability, and the competitiveness of European companies. ZVEI had already proactively promoted this in advance with its initiative 'Digital Accompanying Information: Less Paper, Improved Functionality'.<sup>1</sup>



Consequently, many aspects of the presented drafts are aligned with ZVEI's fundamental positions and are positively regarded by the companies and organisations represented by ZVEI.

However, we also identify certain passages that warrant further scrutiny. In particular, the proposed provisions concerning the digitalisation of instructions and safety information include broad exemptions for consumer products and products that can, under reasonably foreseeable conditions, be used by consumers, even if not intended for them. Here, an explicit paper requirement has been incorporated into EU secondary law, which is linked to undefined conditions and thus leads to legal uncertainty for manufacturers. This is detrimental to the sustainability goals and simplification that are also pursued by the proposals, among other things.

Another point worth highlighting here is the widespread introduction of common specifications in addition to harmonised standards. As an advocate of the stakeholder-driven European and international standardisation system, ZVEI warns that common specifications must only ever be a fall-back solution.

We will address these and other points in detail below.

### In Omnibus IV missing legal acts and uniform requirements

ZVEI welcomes the Commission's decision to align a large number of legal acts, particularly those relating to the NLF system, by means of an omnibus procedure. This is important to achieve consistency and contributes to a level playing field in Europe. Against this background, we would like to point out that further legal acts should be included in the proposals. These should also include legal acts that do not originally belong to the NLF system but oblige manufacturers to provide information.

Further Legal acts laying down documentation requirements are amongst others:

- [\(EU\) 2017/745](#) MDR
- [\(EU\) 2019/1020](#) MSR
- [\(EU\) 2023/988](#) GPSR
- [\(EU\) 2023/2854](#) Data Act
- [\(EU\) 2024/1689](#) AI Act
- [\(EU\) 2024/2847](#) CRA
- [\(EU\) 2024/3110](#) CPR
- [\(EU\) 2025/40](#) PPWR

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<sup>1</sup> <https://www.zvei.org/en/subjects/digital-accompanying-information-less-paper-improved-functionality>

In addition to the missing legal acts ZVEI advocates for the unified implementation of the Omnibus IV package across all relevant legal acts.

## Digital contact details

ZVEI welcomes the Commission's proposal to enable digital contact details of the economic operator, as it reflects the current state of technological development and facilitates communication between economic operators, authorities, and end-users. However, ZVEI strongly opposes any mandatory requirement to display both a postal address and a digital contact. The digital contact shall be sufficient. Therefore, the economic operator should ideally have the option of providing either a postal address or a digital contact until the digital contact becomes mandatory for products subject to a DPP.

We therefore propose the following changes to the relevant passages in the legal acts to be aligned:

*Manufacturers shall indicate on the [product] their name, registered trade name or registered trademark, as well as their postal address ~~and~~ or digital contact or, where that is not possible, in a document accompanying the [product] ~~and~~ or on the packaging, if any, in accordance with point xx of Annex y. The postal address and digital contact shall indicate a single point through which the manufacturer can be reached.';*

*Importers shall indicate on the [product] their name, registered trade name or registered trademark as well as their postal address ~~and~~ or digital contact or, where that is not possible, in a document accompanying the [product] ~~and~~ or on its packaging, if any, in accordance with point xx of Annex y.';*

With regard to the definition, it should be clarified that the ban on registration and app downloads only applies to those within the economic operator's area of responsibility. It must be clarified that not all use of apps is excluded, but that the economic operator itself must not impose any further technical barriers on the user. As an example, a commonly available QR-code scanner is acceptable, whereas an exclusive manufacturer app is not.

Against this background, we propose the following adjustment to the definition of "digital contact":

*'digital contact' means any up-to-date and accessible online communication channel through which economic operators can be reached or engaged without the need to register ~~with the economic operator~~ or to download an application ~~from the economic operator~~.*

## Provision of digital information to authorities and notified bodies

ZVEI supports the move towards providing product compliance information to competent national authorities and notified bodies exclusively in electronic form. This digital approach is in line with the ongoing modernisation of EU product legislation and contributes to increased efficiency in market surveillance and product certification. Transitioning to electronic-only communication with authorities is a positive and future-oriented step that reduces unnecessary administrative burdens and paper use while improving traceability and responsiveness.

## Digitalisation of instructions and safety information

ZVEI welcomes the Commission's approach to enable the provision of digital instructions and safety information, particularly for industrial products, as a step that reflects the state of the art and supports modern information practices, without affecting product markings that contain warnings, which remain affixed to the product where deemed necessary. Manufacturers should be given the flexibility to choose the appropriate format of the instructions and safety information based on the product type and intended use.

However, ZVEI strongly rejects an obligation to provide safety information in paper form for consumer products and products that can, under reasonably foreseeable conditions, be used by consumers, even if not intended for them. This very vague terminology that covers a wide range of products which, due to this vagueness, cannot be precisely interpreted. As a result, manufacturers will be forced to continue choosing paper as the supposedly safest option across the board to achieve legal compliance. This is detrimental to the sustainability, digitalisation and accessibility goals that the EU-Commission is striving for.

The goal should be that end users can access the up-to-date version of safety information in a reasonable and efficient manner, therefore, electronic formats should become the standard.

Hence, we propose the following change to the relevant passages in the legal acts to be aligned:

*Manufacturers shall ensure that the product is accompanied by instructions and safety information in a language which can be easily understood by consumers and other end-users, as determined by the Member State concerned. The instructions and safety information may be provided in electronic form.*

*The manufacturer shall take into account the intended use and the foreseeable end-user of the product when deciding the specific format for the instructions and safety information.*

~~*In the case of product intended for consumers or that can, under reasonably foreseeable conditions, be used by consumers, even if not intended for them, the manufacturer shall provide, in paper format, or mark on the product, the safety information.*~~ Such safety information shall be easily ~~visible~~ accessible and legible for consumers and other end-users.

*When drafting the safety information, the manufacturers shall take account of the intended use and foreseeable misuse by the end-user, as well as the role which the instructions play for ensuring safety.*

*When the instructions, referred to in the first subparagraph, are provided in electronic form, the manufacturer shall:*

*(a) mark on the product, or, where that is not possible, on its packaging or in an accompanying EU declaration of conformity, how to access them and how to request them in paper format;*

*(b) present them in a format that makes it possible for the end-user to print and download the instructions and save them on an electronic device so that the end-user can access them at all times, in particular during a breakdown of the product; this requirement also applies where the instructions are embedded in the software of the product;*

*(c) make them accessible online during the expected lifetime of the product and for at least 10 years after the placing on the market of the product.*

*However, the end-user may, at time of the purchase of the product, or up to six months after that purchase, request the instructions or safety information in paper format. Where the end-user requests those instructions or safety information, the manufacturer or importer shall provide them to the end-user, free of charge, within one month of receiving the request.’;*

## EU declaration of conformity

ZVEI welcomes the approach of products being accompanied by an EU declaration of conformity in an electronic format. In order to avoid multiple machine-readable codes or internet addresses, a single machine-readable code or internet address, such as manufacturer’s product website, may be used to access the EU declaration of conformity, instructions and simultaneously serve as a digital contact, unless where otherwise necessary. This product page should provide access to the EU declaration of conformity, instructions, and digital contact details. Such a pragmatic solution ensures that legal requirements are met without overcomplicating compliance procedures.

## EU declaration of conformity and instructions via the digital product passport (DPP)

ZVEI welcomes the possibility of integrating the EU declaration of conformity and instructions into an across the NLF harmonised digital product passport (DPP), as it supports digitalisation and reflects the state of the art. However, ZVEI opposes a mandatory requirement for exclusive provision of such information via the DPP, as implied by the formulation "shall be provided only". Manufacturers should retain the freedom to make this information also available through alternative channels, such as their product-specific website. This flexibility is essential to ensure accessibility, usability, and future-proof implementation, particularly as technologies and user expectations evolve.

We therefore propose the following change to the relevant passages in the legal acts to be aligned:

*Where other Union legislation applicable to the product requires the economic operator to include the information that the product complies with the requirements set out in that legislation in a digital product passport or to upload the EU declaration of conformity or instructions in a digital product passport, the information required in Annex ... to be included in the EU declaration of conformity and the instructions referred to in Article ... shall be ~~provided~~ sufficient to provide them only in that digital product passport.*

## Common Specifications (CS)

ZVEI believes in the established stakeholder-driven European and international standardisation system. In recent legislations the EU Commission has introduced the possibility to draft common specifications in the absence of harmonised European standards. ZVEI is convinced that common specifications must only ever be a fall-back

solution, limited to health and safety aspects. When European harmonised standards based on international standards are available, they shall always take precedence over CS, as this ensures international alignment and strengthens international competitiveness of European industry, for example EN IEC 63000 under RoHS.

If common specifications are used, it is important to clearly define the conditions, procedures, and rules for the development, use and withdrawal of common specifications – across all relevant legislations. Common Specifications must be subject to the same principles and requirements as hENs (e.g. inclusiveness, consensus, expertise, transparency, stakeholder involvement).

The proposal of the European Commission does not specify or fulfil any (of these) criteria but rather gives the European Commission a blanket check to act without clearly defined criteria. Therefore, we strongly advocate to use the wording of Art. 20 of the Machinery Regulation 2023/1230 as a blueprint, which defines a clear framework for the development, use and withdrawal of common specifications.

At the same time, we encourage the Commission to prioritise enhancing and speeding up the current European Standardisation System, particularly by addressing the delays resulting from limitations within the HAS-system.

## Timing

ZVEI emphasizes that products are regularly subject to more than one legal act. As a result, a product may already benefit from digital provisions under one legal act, while another act may have a different date of applicability. To avoid legal uncertainty and ensure the best possible use of the Omnibus IV package, the responsible economic operator for a product should be allowed to make use of digitalisation as soon as it falls within the scope of any applicable legislation that permits it.

ZVEI welcomes a swift implementation of the Omnibus IV package including the national transposition and recommends guidance in the Blue Guide for the transition period that enables the use of the digitalisation as soon as possible.

## ZVEI: Electro and Digital Industry Association

The ZVEI represents the common interests of the electrical and digital industry and associated service companies in Germany and internationally. The association has more than 1,100 member companies and 170 employees in the ZVEI Group.

At the end of 2024, the industry employed 900,000 people in Germany. This makes it the second largest industrial sector in our country. The sector's 2024 turnover amounted to 220 billion euros.

The electro and digital industry is one of the most innovative economic sectors in Germany. Every year, the industry spends 22 billion euros on R&D and more than nine billion euros on investments.

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