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Less paper, more standards: The case for digitalisation and for repairing, not replacing, Europe's standardisation system

Executive summary

The fourth omnibus proposal touches on two important areas for European industry: the digitalisation of product documentation – which can reduce burdens for companies and take forward Europe's digital transformation – and the generalisation of common specifications across EU product laws.¹ Whilst we see clear potential in the former, the latter would sideline Europe's proven standardisation system.

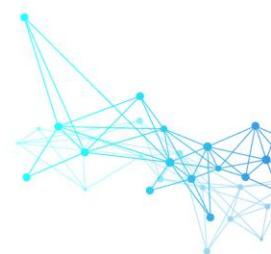
The horizontal introduction of common specifications should be withdrawn. Europe's challenge is not a lack of standards but the persistent failure of the citation process. Industry continues to produce robust, internationally aligned harmonised standards, many of which remain uncited for years due to procedural bottlenecks and legal over-interpretation.


Expanding the use of common specifications would only entrench these problems. It would hand the Commission wide discretion to decide when to bypass harmonised standards, risk making common specifications the default tool rather than the exception and undermine Europe's public-private standardisation model. Unlike harmonised standards, common specifications cannot guarantee openness, inclusiveness or international coherence, nor can they be maintained at the pace of technological progress. The right solution is to repair the citation system, not replace it.²

By contrast, **moving away from paper-based requirements has clear benefits** for companies, consumers and the environment. By reducing printing, translation and distribution costs, digital documentation frees up resources that can instead be invested in innovation, while also cutting waste and

¹ COM(2025)503 and COM(2025)504.

² For a detailed analysis of existing bottlenecks in the European standardisation system, and proposals for how to solve them, see DIGITALEUROPE, *A European standardisation system fit for global influence*, available at https://cdn.digitaleurope.org/uploads/2025/05/Standardsandcompliance_Issues_EuropeanStandardisationSystem_2025_ForApproval_PGApproval_AEuropeanstandardisationsystemfitforglobalinfluence-clean-1.pdf.





supporting the EU's sustainability objectives. The proposal already takes some useful steps, but it can go further:

- ▶▶ **Aligning with existing legislation:** The amended directives must be consistent with the Market Surveillance Regulation (MSR), and recently adopted acts such as the AI Act and Cyber Resilience Act (CRA) should also be updated to remove conflicting paper requirements.³
- ▶▶ **Modernising contact details:** Support the introduction of a digital point of contact, harmonise terminology and remove the outdated requirement for a postal address on products. Where a Digital Product Passport (DPP) applies,⁴ contact details should be provided there.
- ▶▶ **Providing flexibility in documentation:** The DPP should be the default channel, but not the only one. Companies must be free to provide information via other digital means, such as websites or QR codes.
- ▶▶ **Streamlining QR code rules:** Avoid multiple, overlapping QR code obligations and work towards an interoperable international standard.
- ▶▶ **Phasing out paper:** Permit digital documentation without restriction. Where paper is genuinely needed, a short one-page safety sheet is sufficient.
- ▶▶ **Enabling e-labelling:** Allow CE marking and other regulatory information to be displayed digitally on products with integrated screens, as already done in other major markets.

³ Regulations (EU) 2019/1020, 2024/1689 and 2024/2847, respectively.

⁴ Under the Ecodesign for Sustainable Products Regulation (Regulation (EU) 2024/1781).



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Common specifications

The proposed **introduction of common specifications as a horizontal mechanism** across an additional 13 product Directives **undermines Europe's standardisation system** – a framework that's been crucial in making the EU's single market work.

The proposal presents common specifications as a pragmatic fallback in situations where harmonised standards are unavailable, insufficient or delayed. But this diagnosis treats a symptom whilst ignoring the root cause. **The real issue is the breakdown in the citation process for harmonised standards.** Industry has developed, and continues to develop, technically sound and internationally aligned standards, many of which languish for months or years waiting for citation in the Official Journal. These delays are not due to a lack of standards but to procedural bottlenecks, legal over-interpretation and a lack of accountability in governance.

Rather than investing political and administrative capital in a workaround, policymakers should focus on fixing what is broken. This means restoring confidence in the existing system: streamlining the citation process, clarifying requirements for harmonised standards, enabling proper use of international standards and creating predictable, transparent timelines for standardisation work. These are the reforms industry has consistently asked for.⁵

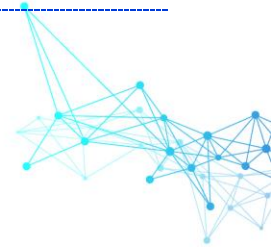
Harmonised standards have served the EU well for over three decades, because they combine legal certainty with technical credibility and market relevance. We must ensure they can do the job they were designed for.

By contrast, common specifications divert resources away from standards development and undermine Europe's global position in international standardisation. Unlike harmonised standards, which are developed through open, inclusive and consensus-based processes, common specifications would be drafted and adopted by the Commission through implementing acts, with limited input from stakeholders and no formal objection mechanism. For these reasons, common specifications cannot reflect the state of the art, and be maintained and updated over time, as effectively as harmonised standards. This limits their transparency, legitimacy and quality.

The use of common specifications risks becoming the default rather than the exception, particularly if the systemic issues with harmonised standard citation are left unaddressed. The triggers for adopting common specifications – such as 'unavailability,' 'insufficiency,' or 'urgency' – are so loosely defined that they leave the Commission wide discretion to decide when to intervene. In practice, this allows the Commission to bypass harmonised standards even where they exist or are close to completion, consolidating in one actor both the power to block citation and the power to draft its own rules. Such unchecked discretion undermines predictability for businesses and blurs the clear division of roles that's at the heart of the NLF.

For these reasons, **the proposed introduction of common specifications should be withdrawn in its entirety.**

⁵ See *Joint statement on the Commission's proposal on common specifications*, available at https://cdn.digitaleurope.org/uploads/2025/07/Joint_statement_Common_Specifications.pdf.





Digitalisation of product documentation

DIGITALEUROPE welcomes the omnibus proposal as a first step towards digitalising product documentation and communication. Its aim is to reduce operational burdens and enable a shift away from outdated paper-based requirements.

Whilst digitalisation requires investment in new systems and ongoing maintenance, these costs are outweighed by the savings from eliminating paper documentation and physical marking, as well as by the environmental benefits. In the long run, digital solutions offer clear advantages in terms of cost efficiency and sustainability. To realise the benefits already highlighted in the staff working document, digitalisation should therefore be applied as broadly as possible, with minimal restrictions. We recommend several important adjustments to this end.

Misalignment with Market Surveillance Regulation

The amended directives should be aligned with the MSR. The MSR already **modified obligations on economic operators without adapting the affected acts**, and this inconsistency remains unaddressed in the proposal. For example, digitalisation of requirements for fulfilment service providers is not included. For clarity and coherence, **such requirements should be consolidated under either the MSR or the relevant sectoral legislation**.

Recently adopted New Legislative Framework (NLF) acts, such as the AI Act and the CRA, should also be aligned to avoid fragmentation. As an illustration, the CRA still requires a (simplified) paper declaration of conformity, whilst the omnibus proposal removes this obligation.

Economic operator contact details

We support the **introduction of a digital point of contact**, which offers flexibility for companies as email addresses are vulnerable to cyberthreats and unsuitable for multilingual communication across the EU. The use of terms such as ‘electronic address,’ ‘email address or other digital contact,’ and ‘web and email address’ across different pieces of legislation should be harmonised with the terminology introduced by this proposal.⁶

The **requirement for a postal address** physically marked on the product once digital communication is mandated by law should also be **deleted**. Where a product falls under legislation that requires a digital product passport (DPP), contact details should be provided directly in the DPP rather than on the product itself.

To avoid conflicting provisions, we **recommend consolidating the rules on economic operators’ contact details in a single place**, rather than repeating slightly different obligations in each sectoral act. A good model is the CE marking, where all legislation simply refers back to Art. 30 of Regulation 765/2008. In the same way, sectoral acts should point to a revised Art. 4(4) MSR, instead of restating requirements individually.

⁶ See General Product Safety Regulation (Regulation (EU) 2023/988), Machinery Regulation (Regulation (EU) 2023/1230) and Batteries Regulation (Regulation (EU) 2023/1542), respectively.

'Only' digital product passport

For products subject to legislation requiring a digital product passport (DPP), the proposal states that certain documentation must be provided on the DPP 'only.' Whilst we agree that the DPP should serve as the primary channel, limiting it as the sole option would prevent companies from also offering the same information through other digital means, such as a website or QR code. To preserve flexibility, we recommend **replacing 'only' with 'by default,'** making the DPP the main channel without excluding other legally valid digital options.

Machine-readable code

Several EU acts already require information to be provided via a digital carrier such as a QR code, often in addition to existing labelling. Similar requirements are also emerging in other jurisdictions, such as the US and India. Without coordination, companies may soon be forced to add multiple QR codes for different legal obligations on the same product. In practice, this could mean placing separate QR codes on the product itself, its battery, packaging and accompanying documents.

To avoid this, **QR code requirements should be streamlined** across EU legislation. In the medium term, the EU should actively **promote the development of an international standard for a single interoperable QR code** that can meet multiple regulatory requirements at once.

Remaining paper requirements


The proposal rightly reduces some paper obligations, but many remain untouched, including in-box safety instructions, packaging labels, energy labels, waste symbols and more. These requirements impose financial and environmental costs for printing, translation and distribution, yet most consumers discard such documents unread.⁷

Digital user documentation should be permitted without restriction, as already foreseen for the DPP. Where paper is unavoidable for consumers, a concise one-page safety sheet should suffice, with full information provided online. This approach is consistent with the CRA, which already allows flexibility between paper and electronic form.

The proposed provision requiring paper documentation whenever a product 'can be used by a consumer under reasonably foreseeable conditions' is too vague and risks sweeping nearly all products back into scope. For example, vending machines installed in shops could be caught, even though consumers never need access to their safety instructions. Such ambiguities must be removed.

E-labelling

⁷ The financial and environmental costs of printing, translating and distributing paper documentation are significant. See ZVEI, 'Digital accompanying information: less paper, improved functionality,' available at <https://www.zvei.org/en/subjects/digital-accompanying-information-less-paper-improved-functionality>.



The proposal does not embrace e-labelling for CE marking, despite its proven benefits.⁸ Products with integrated screens should be allowed to display CE and other regulatory information digitally, as foreseen in the Radio Equipment Directive and already implemented in markets such as the US, China, Canada, the UAE and Japan.⁹

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⁸ See DIGITALEUROPE, *E-labelling for Europe – key facts & figures*, available at https://cdn.digitaleurope.org/uploads/2018/06/E-labelling_flyer2019_WEB-2.pdf.

⁹ Art. 47(2) and Recital 47 Directive 2014/53/EU.



About DIGITALEUROPE

DIGITALEUROPE is the leading trade association representing digitally transforming industries in Europe. We stand for a regulatory and investment environment that enables European digitalizing businesses across multiple sectors and citizens to prosper from digital technologies. We wish Europe to grow, attract and sustain the world's best digital talents, investment and technology companies. Together with our members, we shape the industry policy positions on all relevant policy matters and contribute to its development and implementation. Our membership represents over 45,000 businesses who operate and invest in Europe. It includes corporations and scale-ups which are global leaders in their field of activity, as well as national trade associations from across 30+ European countries.

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