

Joint Statement

Industry Calls for a Pragmatic Approach to Omnibus IV Digital Requirements *(Reaction to the Commission proposal and the amendments adopted by Parliament)*

Our sector is fully committed to **digitalisation and simplification**. We therefore support the EU's ambition to modernise regulatory processes. At the same time, successful digitalisation requires well-designed measures and realistic implementation timelines. While initiatives such as the Omnibus package are designed to simplify EU legislation, it is essential that they do not lead to the opposite effect: **new administrative burdens, rushed compliance, and immediate cost impacts that companies must absorb without adequate preparation time**. Certain elements in the Omnibus IV proposal risk undermining its objective.

- A first concern is the **absence of any transitional period for the mandatory digital Declaration of Conformity (DoC) to Machinery regulation 2023/1230 (MR)**, which would oblige manufacturers to adapt immediately, despite the long development cycles of our sector. Unlike the **provisions for other directives and regulations included in Omnibus IV**, the machinery sector is offered no adaptation time, making orderly and compliant implementation extremely challenging.
- A second concern is the European Parliament's proposal to require digital DoCs with **"direct access" and no transition period**. This would mean that **each QR code must link directly to the specific machine's DoC**, rather than to a landing page where users can enter basic information—such as the machine's serial number—to be redirected to the relevant document. This diverges from the agreed MR, which explicitly allows DoCs to be provided either on paper or digitally. Introducing such a change less than a year before the Regulation becomes applicable creates uncertainty, adds administrative pressure and generates short-term costs for companies already preparing for compliance, in particular for SMEs, with questionable added-value for the Market Surveillance Authorities.
- A third concern relates to the EP's compromise amendment to extend **the period during which paper instructions may be requested** (24 months for consumers and 6 months for professional users). This, while again diverging from the MR, creates legal uncertainty, as "consumer" is not defined in several Regulations covered by Omnibus IV, including the MR, and is also unenforceable, since manufacturers cannot verify whether a request comes from a consumer or a professional user.

Despite raising these points repeatedly, our concerns have so far not been reflected in the ongoing discussions, even though they directly affect the feasibility and coherence of the proposed changes for a highly innovative industrial ecosystem.

Thus, we urge EU co-legislators to ensure that Omnibus IV truly supports Europe's industrial competitiveness by delivering **practical, secure and workable digitalisation measures**.

This includes:

- Introducing a transitional period of at least 24 months for the mandatory electronic Declaration of Conformity, aligning the machinery sector with the **other product-safety provisions in Omnibus IV**;
- removing the **"direct access"** obligation, as requiring each QR code to link directly to an individual DoC creates significant security and forgery risks; the DoC should remain electronically accessible in any format that is not compromising its integrity and retrievability.
- removing the EP compromise amendment that extends the **period during which paper instructions may be requested**.

Our industries stand ready to work with the EU institutions on solutions that **advance digitalisation without disrupting manufacturing**, safeguarding the integrity of compliance documentation and strengthening Europe's industrial competitiveness.

Contact people: Martina Griffo (CECE): martina.griffo@cece.eu; Giovanni D'Arezzo (FEM/EGMF): internalmarket@fem-eu.com; Christophe Tissier (CEMA): christophe.tissier@cema-agri.org; Maitane Olabarria (EUUnited): m.olabarria@eu-nited.net