



Recent updates in European Legislation

29th October 2025

Introduction



- There is a lot of new legislation that is being developed in the European Union.
- This will inevitably have a bearing on the legislation in the GB.
- The Legislation will be implemented in NI.
- The Omnibus IV
- The review of the NAWI and the MI Directive
- The Machinery Regulations



Omnibus IV



- This is a simplification package and a proposal to cut red tape, reduce costs and modernize EU rules as part of the simplification of the single market
- This introduces the significant notion of “digital by default”:
 - *Allow the movement of processes from paper to digital*
 - *Redefine how companies can demonstrate compliance and meet product safety requirements- move away from paper-based Declarations of Conformity*



How will this be done?



- Will include a Directive which will amend both the Directives 2014/31 and 2014/32
- Will include other Directives that cover weighing instruments (RoHS, LVD and EMC)
- Will include a Regulation which does not directly affect the Directives 2014/31 and 32
- Commission staff working document which explains the details

Proposed key changes: Digitalisation of the EU Declaration of Conformity (DoC)



- The DoC must be produced electronically
- When required to accompany a product, be accessible via an internet address or a machine-readable code (like QR codes).
- Important that this does not appear to have an element of optionality

Proposed key changes: Digital Provision of Instructions for Use (IFUs)



- Manufacturers may offer IFUs digitally
- Safety information must still be printed or marked on the product
 - If it can reasonably be foreseen that the instrument will be used by consumers
- Consumers will also have the right to request a free paper copy during a specified period.
- If they are provided digitally must be printable or downloadable

Proposed key changes: Mandatory Digital Contact Point



- Manufacturers must indicate an up-to-date, accessible online communication channel (not requiring registration or application download) on products and in the DoC
- In addition to providing the traditional postal contact address
- This will enable communication between economic operators and national authorities

Proposed key changes: Integration with the Digital Product Passport (DPP)



- Digital Product Passport(DPP) is a digital record that contains detailed information about the product-Introduced by the Ecodesign for Sustainable Products Regulation (ESPR)
- Further strengthens the notion of the DPP
- Where the legislation requires a DPP this will influence the NAWI and MID (batteries)

“Where other Union legislation applicable to an instrument 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 IV to be included in the EU declaration of conformity and instructions referred to in Article 6(7) shall be provided only in that digital product passport.”

Proposed key changes: Electronic Exchanges with authorities



- Documentation requested by national authorities to verify compliance must be provided electronically
- This will reduce the need for paper copies of the Doc to accompany the instrument (requirement under the MID)
- Some authorities are unable (or unwilling) to accept digital documentation- this will tend to force the issue
- This will hopefully improve this somewhat cumbersome situation

Proposed key changes: Omnibus Timeline

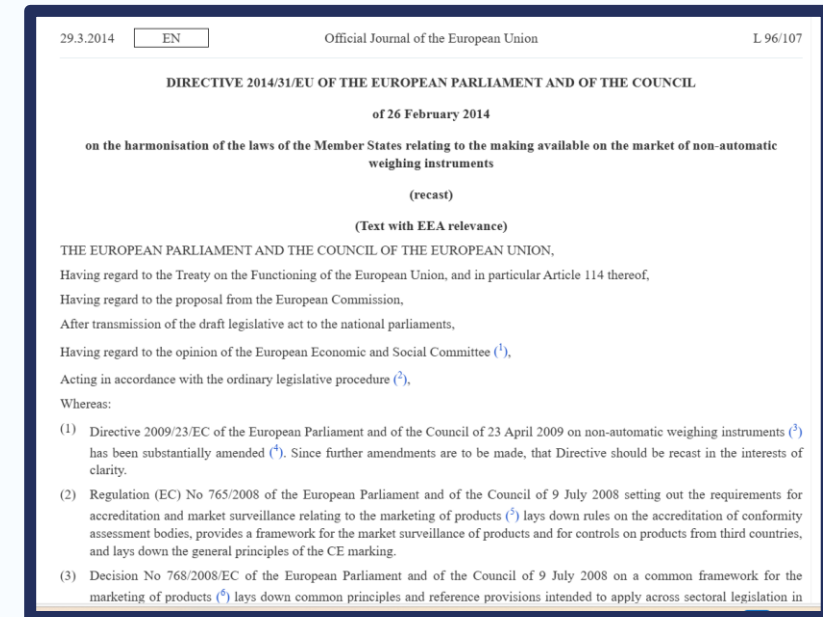


- Even though the measures are still at the proposal stage, the Commission has communicated a clear direction towards digitalised reporting and new compliance methods.
- Even though the measures are still at the proposal stage, the Commission has communicated a clear direction towards digitalised reporting and new compliance methods and it is unlikely the general direction will change.
- Businesses are advised to consider the steps necessary for managing digital DoC's and IFU's and a reliable digital contact point
- Aimed for late 2026

Review of the NAWI and the MID



- This is continuing and the report has been submitted to the Commission outlining the need for reviewing the Directives
- Need for clarity in legislation to ensure consistency across the single market
- Need to have consistent requirements between the MID and the NAWI.
- Use of horizontal legislation in addressing specific issues- cybersecurity and data protection
- Commission will begin a risk assessment
- Targeted amendment to the MID with regard to car charging



UK Implementation



- UK is discussing whether requirements for the Machinery Regulations will be implemented in GB.
- Government agenda to reduce bureaucratic burdens by 25% (tie in with the Omnibus IV)
- Government policy paper- New approach to ensure regulators and regulation support growth (22nd October 2025)
- Regulation Action Plan –Progress and update next steps (October 2025)
 - Both documents talk about the importance of digitisation