



**EUROMOT**

The European Association of Internal  
Combustion Engine and Alternative  
Powertrain Manufacturers

# POSITION PAPER

Comments on OMNIBUS  
PROPOSAL aligning product  
legislation with the digital age:  
Recreational Craft Directive (RCD)

13 August 2025



## EUROMOT and IMEC POSITION

# COMMENTS ON OMNIBUS PROPOSAL ALIGNING PRODUCT LEGISLATION WITH THE DIGITAL AGE: RECREATIONAL CRAFT DIRECTIVE (RCD)

**13 August 2025**

### Key Concerns Raised

#### 1. Digital Contact Information

- The proposal requires manufacturers to provide a digital contact point.
- **Clarification needed:**
  - Is a general company website sufficient?
  - Must manufacturers maintain product-specific digital contact pages?
  - Concern over URL obsolescence and long-term compliance risks.

#### 2. Common Specifications

- Ambiguity around what “common specifications” entail:
  - Are they harmonised standards, Commission-developed technical specs, or guidance documents?
- Legal status, scope, and interaction with existing harmonised standards under RCD need clarification.

### Recommendations

- Provide **clear guidance** on digital contact requirements.
- Define the **scope and authority** of common specifications.
- Ensure **legal certainty** and **regulatory coherence** for manufacturers.



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A European Interest Representative · TVA BE 0599.830.578 · RPM Brussels  
EU Transparency Register Id. No. 6284937371-73

A Non-Governmental Organisation in consultative status with the UN Economic Commission for Europe (UNECE) and the UN International Maritime Organisation (IMO)

**PRESIDENT**

Dr Holger Lochmann

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Dr Peter Scherm

EUROMOT and IMEC welcome the European Commission’s omnibus proposal, which introduces targeted updates to several sectoral laws, notably for the Recreational Craft Directive (RCD). We support the initiative’s aim to facilitate digitalisation and provide clearer, more flexible alternatives for demonstrating product compliance.

We firmly believe that the digital transition reduces the burdens associated with producing paper copies of the owner’s manual and declarations of conformity, makes information more accessible to the end-user, and ensures better compliance verification with improved availability of information (particularly regarding products resold over the course of their lifetime).

While we support the direction of the proposal, we would like to raise two specific points that require further clarification to ensure effective implementation and legal certainty for manufacturers.

### **Digital Contact Information**

The proposal appears to require manufacturers to provide a digital contact point. However, it is unclear whether a general company website is sufficient, or whether a dedicated webpage or contact link must be created for each product or compliance-related matter. We note that specific URLs may become obsolete over time, which could create compliance risks. We therefore request clarification on whether linking to a formal company homepage is acceptable, and whether manufacturers are expected to maintain permanent, product-specific digital contact points.

### **Common Specifications**

The reference to “common specifications” in the proposal also requires further explanation. It is not clear whether this term refers to harmonised standards, guidance documents, or technical specifications developed by the Commission or other bodies. Greater clarity is needed on the legal status, scope, and development process of these specifications, as well as how they will interact with existing harmonised standards under the RCD.

We support the Commission’s efforts to modernise the Recreational Craft Directive through the omnibus proposal and believe it can bring meaningful benefits to industry and regulators alike. To ensure successful implementation, we encourage the Commission to provide additional guidance on the use of digital contact information and the definition and application of common specifications. EUROMOT remains committed to constructive dialogue and stands ready to support the Commission in refining and implementing these important updates.

## **THIS IS EUROMOT**

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

Founded in 1991, we provide an unparalleled heritage and hub of expertise for businesses, authorities, regulators, and public stakeholders worldwide. In partnership with major sector associations and institutions, it is our mission to drive smart regulation and sustainable innovation.

Delivering dependable power for society at high energy conversion efficiency with low emissions remains a key objective of EUROMOT member companies. EUROMOT asserts internal combustion engines and alternative powertrains are a key enabler to address the additional societal need for decarbonisation across multiple industry sectors. This can be achieved by continuing to advance the development of highly efficient energy conversion systems capable of operating on low and net-zero Greenhouse Gas (GHG) energy carriers.

Headquartered in Brussels, EUROMOT is a European interest group, and our profile is registered in the EU Transparency Register under the identification number 6284937371-73. We have been granted consultative status at the United Nations IMO (International Maritime Organization, London) and United Nations ECE (Economic Commission for Europe - Geneva) and other relevant stakeholders.

## **EUROMOT MEMBERS**



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## **About International Council of Marine Industry Associations (ICOMIA) and the ICOMIA Marine Engine Committee (IMEC)**

ICOMIA brings together a wide range of national marine industry associations into one global organisation and represents them at an international level, presenting a strong and united voice when dealing with issues challenging the industry. ICOMIA has been an active advocate for the international marine industry since 1966, working with authorities, regulatory bodies and related organisations to facilitate and encourage the growth of the worldwide recreational marine industry whilst keeping on top of policies and guidance to ensure the promotion, protection and growth of the industry.

IMEC is a separate trade association formed in 1972 representing recreational marine engine and personal watercraft manufacturers worldwide.



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