



EUROMOT

The European Association of Internal
Combustion Engine and Alternative
Powertrain Manufacturers



POSITION PAPER
Comments on Omnibus
Directive aligning product
legislation with the digital
age (RoHs)

27 August 2025



The European Association of Internal
Combustion Engine and Alternative
Powertrain Manufacturers

POSITION PAPER

COMMENTS ON OMNIBUS DIRECTIVE ALIGNING PRODUCT LEGISLATION WITH THE DIGITAL AGE (ROHS)

27 August 2025

EUROMOT welcomes the consultation on the EC proposal for an “**Omnibus Directive Aligning product legislation with the digital age**” and also pleased to have the opportunity to submit our contribution regarding Article 2 of the proposal amending Directive 2011/65/EU (RoHS).

We fully support the transition towards digital documentation and procedures. However, we wish to express our concerns regarding the introduction of Article 16a, which proposes the use of “common specifications” via delegated acts in a regulatory framework that currently relies on a single harmonised standard: EN IEC 63000.

The Role of EN IEC 63000

The EN IEC 63000 standard plays a critical role in supporting environmental compliance and global trade by providing a harmonized framework, applying a risk-based approach, for documenting the material composition of electrical and electronic products. Recognised internationally, EN IEC 63000 aligns with international best practices, promoting consistency across markets and reducing the administrative burden for global manufacturers.

Without this standard, compliance with RoHS and similar legislation would require costly chemical testing of potentially millions of components, resulting in substantial financial and operational impacts.



EUROMOT aisbl

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

GENERAL MANAGER

Dr Peter Scherm

Concerns with the Use of Delegated Acts

The proposal to introduce common specifications via delegated acts represents a fundamental shift from the established model of inclusive, consensus-based standardisation. Traditional standardisation involves collaboration among industry experts, national bodies, NGOs, academia, and authorities which ensures technical robustness of the standard, stakeholder balance, and international harmonisation.

Delegated acts, by contrast, risk introducing politically driven requirements that may lack technical grounding. This is particularly concerning given ongoing discussions with CEN/CENELEC to update EN IEC 63000, which already reflects best practice.

Risks to Legal Certainty and Transparency

Introducing mandatory technical requirements through common specifications, especially when a harmonised standard is already in place, raises significant issues:

- It undermines legal certainty and transparency.
- It bypasses the usual legislative process.
- It introduces obligations whose impact cannot be properly assessed.
- It risks creating de facto regulatory requirements without stakeholder consultation.

Such an approach could erode trust in the regulatory system and compromise the legitimacy of technical rules across the Single Market.

Common specifications can serve as a useful interim tool in the case where there's an absence of harmonised standards, but it is important to ensure that their use is only employed where their role is demonstrated to be necessary with transparent conditions and justifications, and that they are developed, as part of a full public consultation with all stakeholders.

The draft proposal in the Omnibus Directive goes against this principle of transparency, giving the European Commission the ability to introduce Common Specifications in RoHS even when a globally recognized harmonised standard is already best practice.

Recommendation: Use the Machinery Regulation as a Blueprint

EUROMOT strongly recommends that the European Commission reconsider the current proposal and instead adopt the framework outlined in Article 20 of the Machinery Regulation (Regulation 2023/1230). This article provides a clear, transparent process for the development and use of common specifications, ensuring they are only introduced when:

- A harmonised standard has not been accepted or delivered.
- No reference has been published or is expected within a reasonable timeframe.
- The process includes full stakeholder consultation.

For reference, Article 20.3 of the Machinery Regulation states:

The Commission may adopt implementing acts establishing common specifications covering technical requirements that provide a means to comply with the essential health and safety requirements set out in Annex III for products within the scope of this Regulation...

Those implementing acts shall only be adopted where the following conditions are fulfilled...

(a) the Commission has requested a harmonised standard and it has not been accepted, delivered, or complied with;

(b) no reference to harmonised standards has been published or is expected within a reasonable period.

This model ensures that common specifications are used only when necessary and developed through a transparent and inclusive process.

Final Remarks

EUROMOT remains committed to supporting the European Commission in its efforts to modernise product legislation. We are available for further dialogue and stand ready to provide technical expertise to ensure that regulatory developments are both effective and feasible for industry.

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.

OUR MEMBERS



www.euromot.eu



EUROMOT aisbl

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

GENERAL MANAGER

Dr Peter Scherm



Contact Us

EUROMOT aisbl

The European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers

Aliénor Poher
Senior Manager Regulatory Affairs
and Sustainability



+32 (0) 28 93 21 42



Rue Joseph Stevens 7
1000 Brussels - Belgium



alienor.poher@euromot.eu



www.euromot.eu

TVA BE 0599.830.578

RPM Brussels

EU Transparency Register
ID number: 6284937371-73