

THE IMPACT OF EU REGULATORY BURDEN ON EUROPE'S TECHNOLOGY INDUSTRIES

A series of examples illustrating how burdensome and redundant regulations hinder Europe's high-tech manufacturers in producing solutions for Europe to reach net-zero.



Unnecessary administrative burden for Declarations of Conformity, instruction manuals and CE marking

What is the concerning part?

As per the Blue Guide, if a product falls under multiple legislations, manufacturers can compile a single Declaration of Conformity (DoC) consisting of a dossier containing all relevant individual DoCs. While certain legislations like Radio Equipment Directive (RED) and the new Machinery Regulation allow for digital DoCs, others do not. Consequently, to meet mandatory requirements, manufacturers must include certain DoCs with each distributed product, as only some can be provided digitally. Additionally, despite the potential for digital documentation, instruction manuals are still preferred in paper format. Furthermore, CE marking, particularly for radio products under the RED, mandates packaging imprints not required elsewhere, which complicates compliance.

Why is this a burden?

The discrepancies in Declarations of Conformity result in legal uncertainty and heightened burdens for manufacturers. Embracing digital instruction manuals has the potential to propel EU sustainability objectives forward. Furthermore, the divergent CE marking requirements for radio and non-radio products introduce unnecessary complexities.

How could this be solved/improved?

To address these challenges, we recommend harmonising the New Legislative Framework (NLF) legislation, allowing for the exclusive use of digital Declarations of Conformity, digital instructions and for the CE marking to be included on the products only.



The series 'The Impact of EU Regulatory Burden' aims to provide examples of the adverse impact of poorly crafted legislation on Europe's technology sectors and propose strategies for minimising burdensome requirements and enhancing future legislative frameworks. These studies shed light on the excessive regulatory burdens arising from recent and forthcoming horizontal EU legislation. Specifically, they illustrate how current legislation fails to enhance policy outcomes, instead imposing significant burdens that undermine Europe's appeal for investment, innovation, and progress in the twin green and digital transitions. It's important to note that these studies are not exhaustive; they do not address burdens from product-specific or older legislation, excessive national-level burdens, or conflicts between EU and national law. They are part of broader initiatives aimed at identifying and addressing regulatory hurdles and single market barriers.

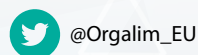
In conjunction with these findings, Orgalim presents several ideas on the implementation of upcoming legislation to minimise burdensome requirements and on how to draft legislation going forward, ensuring a more conducive environment for Europe's technology industries.

Overall recommendations:

To ensure regulation can be a competitiveness driver in the long run, we ask EU policymakers to:

- Recommit to technology-neutrality in new legislation so that it remains future-proof in a period of rapid technological advances.
- Properly implement existing legislation before adding new requirements.
- Improve policy coherence across different fields and avoid overlap and double regulation between EU instruments.
- Introduce comprehensive competitiveness checks, both for the legislative proposal and during its adoption, to prevent disproportionate burdens in new legislation.
- Strengthen the use of 'lean' regulation, namely in the form of market-/price-based instruments and approaches such as voluntary agreements or codes of conduct.
- Simplify reporting criteria for companies, keeping in mind the specific reality of mid-sized companies above the SME threshold and of heavily export-dependent businesses whose competitiveness is disproportionately affected by EU rules.

SHAPING A FUTURE THAT'S GOOD



Orgalim represents Europe's technology industries, comprised of 770,000 innovative companies spanning the mechanical engineering, electrical engineering, electronics, ICT and metal technology branches. Together they represent the EU's largest manufacturing sector, generating annual turnover of €2,819 billion, manufacturing one-third of all European exports and providing 11.9 million direct jobs.



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