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The EU's rules for industrial products are under review

But what is the New Legislative Framework (NLF) And why does it matter for Europe's technology industries?

Key takeaways

- The NLF is a cornerstone of Europe's industrial policy;
- Getting its revision right is critical for EU industry, competitiveness, and resilience;
- Orgalim advocates for a simple, digitalised, coherent framework that is fit for the future.

1. What is the New Legislative Framework (NLF) and why is it relevant?

The New Legislative Framework (NLF) is the EU's core system when it comes to industrial products. It sets common rules on things like product compliance, and CE marking, that little symbol we all recognise that confirms a product meets certain requirements.

In the past, detailed technical specifications were embedded within the legislation. That meant that as technology developed and these specifications inevitably changed, entire pieces of legislation needed to be amended and adopted. The New Approach, introduced in the mid-1980s, separated essential requirements (which are set out in legislation), and technical specifications (which are defined in what are called 'harmonised standards.').

Following on that logic, the NLF was devised to consolidate the New Approach by adding clear responsibilities, a robust framework for conformity assessment, product traceability, stronger enforcement via market surveillance and a common legal framework across product legislation.

This approach allows rules to evolve with technological progress without reopening legislation each time. For Europe's technology industries, this provides:

- Legal certainty across multiple product categories;
- A coherent framework when products fall under several pieces of legislation (e.g. machinery, radio equipment); and
- Simplified market access, as CE marking replaces multiple national approvals.

In practice, companies can self-declare conformity for most products, provided they meet all applicable requirements and maintain the necessary documentation for authorities, while higher-risk products still require third-party certification.

2. Does the NLF support the EU's competitiveness goals?

Yes, it strongly supports our competitiveness goals. In particular, it underpins a well-functioning Single Market by reducing fragmentation across Member States and lowering compliance costs for companies. It also ensures:

- A level playing field for all manufacturers;
- Technology neutrality (avoiding political bias toward specific solutions); and
- Regulatory predictability, enabling long-term investment and innovation.

A stronger internal market makes Europe more attractive to global investors and strengthens the global position of the EU industry. So this makes us more competitive.

3. Does the NLF contribute to Europe's strategic autonomy?

Yes. A strong and harmonised Single Market is essential for Europe's ability to act independently. The NLF is a cornerstone of this, as it aligns rules across Member States for industrial products, enables companies to scale within Europe and strengthens the reliability of the EU's internal market. While the NLF applies specifically to industrial products (not services or other sectors), it is often seen as a model for deeper integration in other areas. Strategic autonomy ultimately depends on a robust internal market - and the NLF plays a key role in delivering that.

4. Can the NLF support circularity and digitalisation?

It can, but it must evolve if it wants to do this well. Although it is now over 20 years old, the NLF remains strong in its core principles. However the policy landscape has changed significantly. The current revision aims to better reflect:

- Sustainability and circularity goals; and
- Rapid digital transformation.

Digitalisation is particularly important. Today, market surveillance authorities often rely on manual processes such as requesting documentation directly from manufacturers. A more digital system could:

- Allow faster and more efficient compliance checks;
- Improve enforcement; and
- Reduce administrative burden for both companies and authorities.

For example, linking products to digital documentation via QR codes could streamline access to compliance information.

5. What policy recommendations are needed to unlock the NLF's full potential?

Orgalim supports a balanced and forward-looking revision of the NLF. We want to preserve what works and maintain the core principles of the framework. We want to ensure a clear, coherent system for industrial producers. The NLF was a simplification tool, and we must keep this in mind as we refresh it today: it should not become a source of additional complexity.

We also want it to deliver smart digitalisation. Digitalising existing and publicly-available documentation and enabling access via simple tools such as QR codes, would provide immediate benefits to users and market surveillance authorities. On the other hand, sensitive information and technical documentation must remain protected. Manufacturers should only need to share this upon request by authorities.

In addition, we believe it can support circularity by providing clear definitions of terms such as 'refurbishment' and 'remanufacturing' and by outlining the obligations of the different operators involved.

Finally, we want it to strengthen the level playing field for conformity assessment bodies through the improvement of oversight, accountability and competence levels; and for manufacturers through stronger enforcement and safeguard procedures.

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 over €2,972 billion, manufacturing one-third of all European exports and providing over 11,9 million direct jobs. Orgalim is registered under the European Union Transparency Register – ID number: 20210641335-88.