



Feedback on the call for evidence on Better Regulation

1. Realistic and Adequate Transition Periods

Current EU legislative proposals are adding multiple new product requirements simultaneously or sequentially while seeking to reduce phase-in and transition periods. This creates additional burdens and challenges where manufacturers cannot comply in time. Better regulation requires:

- Detailed and ongoing engagement with industry affected by proposed legislation. By regular engagement throughout the process legislators can minimise the risk of delays in the legislative process and ensure that progressive evolutive legislation – that is achievable and embraced by industry – can be produced.
- Mandatory plausibility checks to verify that allocated implementation periods are realistic and achievable for industry.
- Staggered transition approaches that recognise different compliance timelines for various product categories.
- Transition periods that account for the full implementation cycle: standard development time, application of standards in product design, product testing, certification processes and importantly time for Notified Body Accreditation
- Avoiding situations where products cannot legally be placed on the market when new legislation takes effect due to insufficient preparation time

2. Proportionate Conformity Assessment Requirements

Proportionate regulation represents the cornerstone of effective policymaking, ensuring that legislative requirements reflect actual risks while remaining practically implementable by industry. When regulation becomes disproportionate (either through excessive requirements or unrealistic timelines) it undermines both competitiveness and the very safety and performance objectives it seeks to achieve.

One of the current challenges for EU manufacturers stems from implementation of multiple legislative frameworks. When numerous pieces of legislation impose new requirements simultaneously without coordinated transition periods, manufacturers face an impossible compliance puzzle. Each regulation may individually appear reasonable, but collectively they create overlapping deadlines, competing resource demands, and technical conflicts. A manufacturer must simultaneously develop new products meeting updated requirements, environmental standards, digital compliance obligations, and cybersecurity rules—all while managing normal business operations. This legislative congestion forces difficult choices: delays product launches, diverts resources from innovation, risks non-compliance and importantly reduces investment in growth.

Product safety, performance, and environmental legislation must be progressive—continuously raising standards to protect consumers, workers, and ecosystems. However, progression without achievability becomes counterproductive. When transition periods fail to account for the complete implementation cycle—developing standards, redesigning products, testing prototypes, certifying compliance, and manufacturing at scale—even willing manufacturers cannot comply. This does not enhance safety; it merely penalises legitimate businesses while potentially driving production outside EU jurisdiction where standards may be lower.

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Achievable regulation requires realistic plausibility checks before adoption. Policymakers must verify that allocated timeframes align with technical realities, that **required** standards can be developed and published in time, and that sufficient conformity assessment capacity exists. Staggered timeline approaches and legislative alignment allow industries to prioritise highest-risk areas first while building capacity for broader implementation.

Proportionate regulation also means matching assessment requirements to actual risk levels. Evidence-based approach reduces unnecessary burden without compromising safety. This frees both industry resources and authority capacity to focus on genuine risks.

Ultimately, proportionate regulation achieves its objectives by being both ambitious and realistic, recognising that effective implementation serves safety better than aspirational requirements that cannot be met.

3. Accelerated and Efficient Standards Harmonisation

The EU's product and environmental standards harmonisation activities are vital in driving improvements but the process can be slow. Multiple factors contribute to this: increased global competition in standardisation, growing technical complexity, erosion of the Commission's trust in industry, and burdensome new processes. Better regulation requires:

- Active engagement with industry to build trust and understanding.
- Streamlining and accelerating the process of updating harmonised European standards (hENs) whilst not losing robustness.
- Reducing delays caused by lengthy legalistic procedures that do not improve the technical content of standards.
- Adaptable and reasonable transition periods based on technical content complexity and international timelines.
- Restoring trust and efficiency in the European Standardisation System.

4. Harmonized Digital Documentation Across All Legislation

Current inconsistencies force manufacturers to provide some declarations digitally while others must be supplied in paper format, creating unnecessary complexity and environmental burden. Better regulation requires:

- Aligning all New Legislative Framework (NLF) eg the Construction Product Regulation (CPR), Ecodesign regulation etc legislation to uniformly permit digital Declarations of Conformity (DoCs), digital Declaration of Performance, technical specifications – and consider how all information could be included on one document - digital instruction manuals, and CE-marking on products only
- Making digital formats a genuine "either/or" alternative to paper, not an additional requirement
- Avoiding centralised platform storage mandates for manufacturer information
- Extending digital options consistently to all guidance documents
- Ensuring guidance documents do not impose restrictions beyond primary legislation

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5. Legislative Consistency and Legal Certainty

Discrepancies across multiple pieces of product legislation create confusion, legal uncertainty, and unnecessary compliance costs. Better regulation requires:

- Systematic elimination of contradictions and inconsistencies across EU product legislation.
- Coherence with existing standards and methods – introducing new technical specifications and methods in legislation increases burden on industry significantly and can have performance and safety implications as a robust standardisation process has not been followed.
- Uniform approaches to documentation requirements, marking obligations, and conformity assessment procedures.
- Coherence between primary legislation and subsequent guidance documents.
- Regular review mechanisms to identify and resolve cross-legislative conflicts.

These regulatory improvements would reduce burden while maintaining safety standards, enhance EU manufacturing competitiveness, support sustainability goals, and create a more efficient single market.

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