Council of the European Union
General Secretariat

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LIMITE

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WORKING DOCUMENT

From: To:	General Secretariat of the Council Antici Group (Simplification)
N° Cion doc.:	IM 5023 2025 INIT
Subject:	Omnibus IV (digitalisation and common specifications) - Compilation of written comments

Please find attached additional comments on Omnibus IV - Digitalisation & Common specifications as received from AT.

Omnibus IV – Common Specifications
AT Comments/Questions – 16.06.2025

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Concerning Directives 2014/30 EU, 2014/34 EU, 2014/35:

- Harmonized standards are the result of broad consensual processes within European standards organizations.
- Especially in the field of electrical engineering, there is a strong reference to international standards (80% of electrical engineering standards are based on IEC), which is why a departure from the proven current system of market access via harmonised standards through the introduction of *Common Specifications* should only occur under very clearly defined rules.
- In particular, replacing the broad pool of experts working on harmonised standards with consulting firms developing *Common Specifications* raises questions of legitimacy.
  - ⇨ Who would select these consultants?
  - ⇨ What role will the Member States have in this process?
  - ⇨ Compared to the usual standardization bodies, which people with which competencies develop these *Common Specifications*?
  - ⇨ Could you explain the rationale behind the newly introduced broad, vaguely defined, discretion of Cion in the use of *Common Specifications*? [see c) where the Commission considers that there is a need to address an urgent concern with regard to non-compliant electrical equipment.]
  - ⇨ How can we prevent *Common Specifications* from undermining the proven current system of European harmonised standards in the medium and long term, especially since *Common Specifications* should not be withdrawn once harmonised standards are in place?
  - ⇨ The machinery regulation could serve as a blueprint for the wording of *Common Specifications*; why is its wording not used?

Concerning Regulation (EU) 2016/42

- According to Article 2 (6) of COM(2025) 504 final, Cion will prepare implementing acts with the support of the Committee for Cableways (set out in Article 44 (2) Regulation (EU) 2016/424); the final decision lies solely with Cion.
  - ⇨ Could you explain the rationale behind this?
  - ⇨ What are the advantages of Cion at the helm of this process in comparison to the current system with a strong role, due to the vast experience, of cableway standardisation bodies?
  - ⇨ The cableway sector is already completely covered through harmonised standards; could you explain, why the introduction of *Common Specifications* would be necessary?
  - ⇨ Could you explain why *Common Specifications* do not foresee a sunset clause when harmonised standards are introduced?