



Japan Machinery Center
for Trade and Investment

August 22nd, 2025

Our Comments on the Omnibus IV, Digitalisation and alignment of common specification

Dear Sirs,

The Japan Machinery Center for Trade and Investment (“JMC”) is a non-profit organization with the character of a public-interest corporation. It was established in December 1952 in accordance with the Japanese Export and Import Trade Law under the authorization of the Minister of Economy, Trade and Industry of Japan. The objective of the JMC is to engage in activities that enhance the common benefit of member companies and promote the sound development of international trade and investment by the machinery industry. JMC comprises member companies engaged in machinery and systems-related exports and foreign investments such as machinery manufacturers, trading houses and engineering companies. At present, the total number of JMC member companies is about 240.

Our committee handles environmental and product safety issues regarding products for trade and is strongly concerned with overseas environment- and product safety-related regulations on products. From this standpoint, we would like to send our comment on the Omnibus IV, Digitalisation and alignment of common specification.

If you have any questions, please feel free to contact our secretariat (Ms. Akari Shiga, E-mail: shiga@jmcti.or.jp).

Sincerely yours,

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JMC comments on Omnibus IV, Digitalisation and alignment of common specifications

We welcome the opportunity to participate in the public comment call for the Omnibus IV Proposed Regulation (COM (2025) 504) for Digitalisation and alignment of common specifications.

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14699-Omnibus-Regulation-Aligning-product-legislation-with-the-digital-age_en

JMC strongly supports the policy of Omnibus package IV simplifying product legislation and reducing bureaucracy in the European Single Market.

However, we are concerned that the proposed amendments to the proposed Regulation for the digitalisation and alignment of common specifications contain items that could increase the administrative burden on companies.

We would like to ask that the final amending Regulation be in line with the following proposals.

- 1. Replace all “digital contact” with “electronic address” and replace all definitions of “digital contact” with the definition “electronic address means an electronic address of the single contact point at which they can be contacted” for Proposed Regulation (COM (2025) 504)**

Reasons: Although Regulation (EU) 2023/988 is not included in the proposed amendments, the “digital contact” in the proposed amendments and the “electronic address” in Regulation (EU) 2023/988 are considered to be almost synonymous. Many companies deal with both products covered by Union harmonisation legislation and products that are not subject to it and displaying an “electronic address” in accordance with Regulation (EU) 2023/988. If it is interpreted that there is a difference between these two wordings and there is an obligation to display and operate differently between these two wordings, it will place a large administrative burden on the companies and will be contrary to the purpose of the Omnibus package. We propose bringing it in line with Regulation (EU) 2023/988, which will remain in its current form. This approach would be beneficial for both companies and consumers through simple management for companies and better understanding for consumers by establishing a “single contact point”.

- 2. The application of all the amendments to the requirements for indicating the information of manufacturers and importers on products, for example, Article 6(4)(b) and Article 6(7)(a), should be set at 36 months after the date of entry into force.**

Reason: In the proposed amendments to the CLP Regulation (Regulation (EC) No 1272/2008) etc. (COM(2025)531) under the Omnibus Package VI, it is proposed to add “digital contact” to the supplier information required as a label element (CLP Regulation (Regulation (EC) No 1272/2008) Article 17-1(a)), and the application of this requirement is set at 36 months after the date of entry into force. If a transition period of 36 months is granted for labelling for hazardous chemicals, it should also be acceptable to provide a similar transition period for products covered by the Regulations subject to this amendment proposal. Furthermore, there are businesses that supply both products subject to the Regulations which would be amended by this proposal and those subject to the CLP Regulation. To avoid confusion and to reduce the burden of changing product labelling, the longer transition period of 36 months should be adopted for both.

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