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## Outdoor Noise Directive - Definition of Equipment Nr. 46

### 1) Equipment Nr 46

The impact assessment “Supporting study for an evaluation and impact assessment of Directive 2000/14/EC on noise emission by outdoor equipment” by VVA introduces “Equipment Nr. 46” in Table 5-21 as “Power Sweepers”. We are concerned about this development, as this defining name is chosen despite the findings of earlier studies and reports.

The TNO report called “Equipment Nr. 46” “Power Sweepers (Road Sweeper)” but added in their findings a remark to (Quote:) “Change name to Road Sweepers. The prEN 15429 definition for road sweepers should be used in future”. Furthermore, it acknowledged that the term “Power Sweeper” would include also (Quote:) “industrial sweepers which are mainly used indoors (outdoors only in industrial areas)” which was not desired to capture under this definition. This is also represented by the chosen pictures for these kinds of machines:

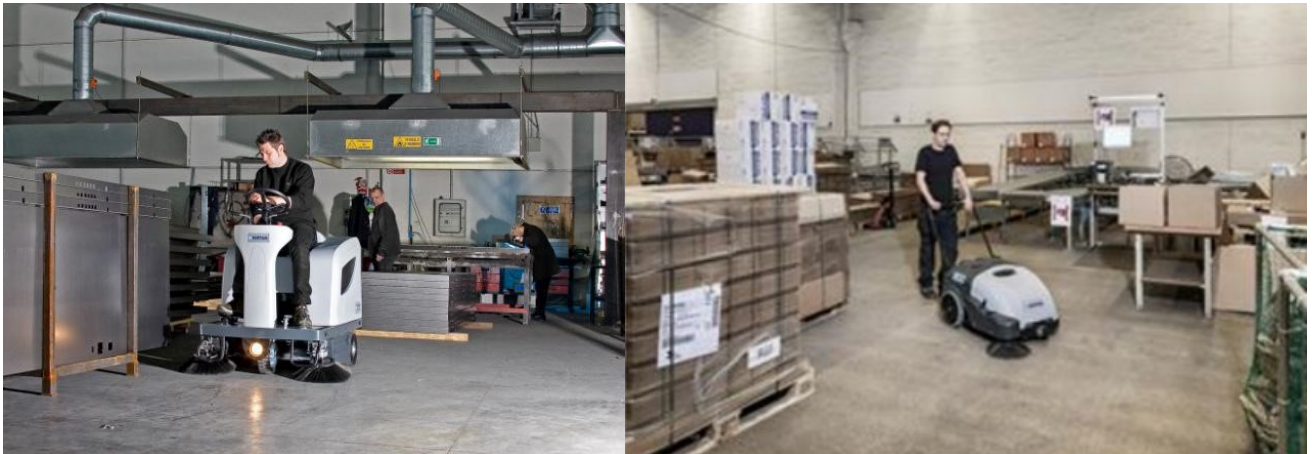
### Road Sweeper according to the TNO Report:

TNO report | MON-RPT-033-DTS-2007-02554 | v4.3 | September 28, 2007

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## Power Sweeper according to EN 60335-2-72:



As stated by the TNO report, these machines are used mainly indoors, if applied outdoors then only ride on machines and only in industrial areas and for a short period of time and maximum 1-2 times a month on average if weather conditions allow and not in close proximity to residential areas would be included.

The ODELIA study came to the same conclusion for Equipment Nr.46 as the TNO report did. It is stated that “Definition: Rename to **Road Sweepers** and include other types of sweepers for outdoor use and street washing machine”.

Although, it was stated several times that the name “Power Sweeper” is misleading, the VVA impact assessment does not take this into account which leads to aforementioned confusion.

### 3) Differentiation by safety standards

To differentiate the term “Road Sweeper” and “Power Sweeper” industry uses the well-established safety standards since a long time. The term “Road Sweeper” is well defined by EN 15429-1, whereas these kinds of machines are excluded from EN 60335-2-72 (below excerpt from standard; reference to EN 15429-1 will be updated).

This standard does not apply to

- floor treatment appliances for household use (IEC 60335-2-10);
- floor treatment machines for **commercial use** (IEC 60335-2-67);
- spray extraction machines for **commercial use** (IEC 60335-2-68);

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IEC 60335-2-72:2016 © IEC 2016

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- wet and dry vacuum cleaners, including power brush, for **commercial use** (IEC 60335-2-69);
- **road sweepers;**

**NOTE 103** In Europe, EN 13019 covers road sweepers.

- machines designed for use on **slopes** with a gradient exceeding 20 %;

#### **4) High pressure water jet machines**

EUnited Cleaning strongly supports the outcome of the Odelia study to leave high pressure water jetting machines in Article 13.

(see also “OND Comments of EUnited Cleaning\_10092015”)

#### **5) Conclusion**

As we are concerned that products which should not belong in scope of the Outdoor Noise Directive, as they are used indoor and rarely outdoor (if at all) in industrial areas, will fall within the scope of the OND, we would be in favor to realize the findings of the TNO report and the ODELIA study and rename “Equipment Nr 46” into “Road Sweeper” taking the appropriate definitions from the well-established safety standard EN 15429-1 and clarify that power sweepers according to EN 60335-2-72, which are by definition not road sweepers, are out of scope.

EUnited Cleaning strongly supports the outcome of the Odelia study to leave high pressure water jetting machines in Article 13.

A handwritten signature in blue ink that reads "Frederik King". The signature is written in a cursive style with a blue background highlight.

Frederik King

Technical Director EUnited Cleaning