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Engineering industries call for renewed trust in manufacturers' self-assessment of machinery based on Harmonized Standards

This week's rushed vote of the IMCO committee on the proposed machinery products regulation has unfortunately yielded mixed results.

EUnited, representing the European engineering industries, is of the opinion that the proposed split of Annex I into parts A and B lacks proper consideration. In particular, point 13., "Manually loaded trucks for the collection of household refuse incorporating a compression mechanism" being listed under Part A, is unjustified and disproportionate.

If endorsed, these vehicles would have to be third-party-certified in future as they are listed under Part A. Manufacturers would thus no longer be allowed to self-assess their vehicles on the basis of Harmonized Standards (module A).

Why these vehicles are listed under part A and not part B is entirely unclear to EUnited members who have worked hard together with occupational safety experts, operating companies and Labour Ministries to provide very recently revised Harmonized Standards (EN 1501-1:2021, -2, -3 and -5). These new standards introduce significant, additional safety features and substantial improvements. After being checked by expert consultants, these standards were deemed state-of-the-art and published in the European Commission's OJ on 13 April 2022¹.

Although there is no noticeable accident history, a costly and time-consuming third-party certification is foreseen in this proposal, despite the fact that all relevant Harmonized Standards are available and updated. Furthermore, considering the negative impacts of the past difficult years and the current crisis, EUnited urges decision-makers to not put additional burdens on its manufacturers, mainly European SMEs, unless there is clear evidence that a market-failure would need to be addressed.

¹ OJ listing (13 April 2021): https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2022.115.01.0075.01.ENG&toc=OJ%3AL%3A2022%3A115%3ATOC

Therefore, EUnited calls upon trilogue negotiators of the future machinery regulation to renew their trust in European manufacturers abilities to self-assess their machinery based on the latest Harmonized Standards by moving point 13. in annex I from part A to part B.

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