

5 December 2022

Machinery Products Regulation trilogue

Call for trust in European Harmonised Standards and self-assessment for manufacturers of manually loaded trucks for collection of household refuse (annex I, point 13)

In view of the next trilogue negotiations of European co-legislators on the machinery products regulation on 15 December 2022, EUnited's [Municipal Equipment](#) manufacturers remain highly concerned that "Manually loaded trucks for the collection of household refuse incorporating a compression mechanism" (annex I, point 13) may be listed under part A of the future regulation.

For manufacturers, which include many SMEs and European members of EUnited, this would result in a significant change compared to the long established practice, as they would no longer be allowed to self-assess their vehicles based on Harmonized Standards (module A of the machinery directive) but forced instead to use third-party certification under the new regulation.

Being singled out in such a way is unfounded and unnecessary as our members have already been working hard together with occupational safety experts, operating companies and labour ministries, to introduce significant, additional safety features and substantial improvements in the applicable Harmonised Standards (EN 1501-1:2021, -2, -3 and -5). After being thoroughly checked by expert consultants, these standards are now published in the European Commission's OJ on 13 April 2022¹.

Lastly, in spite of the absence of any noticeable accident history or evidence of market-failure, mandatory third-party certification would not result in tangible benefits, but only increase complexity and costs for European SMEs already under significantly pressure due to the ongoing health and economic crises as well the more recent energy crisis.

Thus, EUnited calls upon trilogue negotiators to confirm their trust in European manufacturers' abilities to self-assess their machinery based on the latest Harmonised Standards and to therefore keep point 13 ("manually loaded trucks") under part B of annex I.

¹ OJ listing (13 April 2022): 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

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