

## EGMF statement

# The future Machinery Regulation should enhance innovation, not stifle it

21 April 2021

The European garden machinery and outdoor power equipment industry has always considered the Machinery Directive as the core legislative pillar for our sector. This piece of legislation – which is a key element of the European Single Market – has offered a stable and successful legal framework for more than a decade.

The new proposal revising the Machinery Directive includes crucial changes that will have a significant impact on manufacturers of garden, landscaping, forestry and turf maintenance equipment for years to come.

On the positive side, EGMF welcomes the alignment with the New Legislative Framework and the change into a Regulation, which would ensure a coherent application in the internal market.

In addition, EGMF is pleased to see that its proposal to introduce digital instructions is now fully reflected in the proposed legal text, supporting efforts towards a paperless European industry. Embracing the available technologies to supply information to users is essential to achieve a modern and future-proof regulatory framework.

On the other hand, we are extremely concerned about some new provisions since these will hamper innovation, an essential element of the EU competitiveness and sustainable growth agenda, and go against the principle of technology neutrality, such as:

- **The removal of the self-assessment option for high risk machinery (Annex I):** Manufacturers could until now choose to self-certify these machines as long as they apply all relevant European harmonised standards, provided that those standards cover all of the relevant essential health and safety requirements. An exclusive third-party conformity assessment would effectively weaken trust in the use of European harmonised standards. This will also result in additional administrative burden, unnecessary costs and delays to place new products on the market - an essential success factor for seasonal business - with no safety benefits whatsoever. No evidence has been provided that justifies this change.
- **The classification of machinery embedding AI systems ensuring safety function as high risk machinery (Annex I):** This will generate a precedent of dangerousness not only for certain equipment with AI functionalities, for instance robotic mowers, that has been safely operating on the market for more than twenty years, but also for any AI embedded machines with a safety function that will be placed on the market in the future. Consequently, it would hinder innovation, as any future AI machinery could be included in Annex IV. No evidence has been provided that justifies this change.

EGMF stands ready to cooperate with the European Council and the European Parliament during the upcoming decision-making process to achieve a more balanced piece of legislation. The future Machinery Regulation should enable European industry to make the most of the digital transformation, while protecting the machinery sector's competitiveness and providing proportionate legal requirements, to continue guaranteeing a high degree of safety for machinery used by European citizens.



For further information, please contact Anne Claire Rasselet, EGMF Secretary General ([secgen@egmf.org](mailto:secgen@egmf.org)).



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*The European Garden Machinery Industry Federation – EGMF – has been the voice of the entire garden machinery industry in Europe since 1977. With 30 European corporate members and 7 National Associations representing manufacturers of garden, landscaping, forestry and turf maintenance equipment, we are the most powerful network in this sector in Europe.*

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