

EGMF input on the European Standardisation Roadmap

6 August 2021

European Garden Machinery Industry Federation (EGMF) represents manufacturers of garden, landscaping, forestry and turf maintenance equipment. The garden and outdoor power equipment industry represents a very wide variety of equipment, ranging from small hand-held machinery to large ride-on products. In addition, EGMF's user base comprises both consumers and professionals.

The portfolio of EGMF equipment falls within the scope of numerous pieces of EU legislation, notably the Machinery Directive, Outdoor Noise Directive, Electromagnetic Compatibility Directive, all of which make use of the concept of harmonised European standards that provide a presumption of conformity to the respective EU legislation.

EGMF's experience and reflections on governance issues in the European Standardisation System

Bearing in mind the importance of harmonised standards in view of conformity to EU law, it should be noted that EGMF members are very much involved in the standardisation activities at national, European as well as global levels. Participation of skilled and knowledgeable experts is totally voluntary based on employers' willingness to allow workers to undertake these external activities.

The roadmap aims to improve the performance of the European Standardisation System (ESS) to ensure it delivers harmonised standards in a flexible, efficient and timely manner. Based on the experience of EGMF members, draft standards are being produced in a timely manner, following the procedures set by the standardisation bodies. However, many delays occur at the point of publishing harmonised standards for the following reasons:

- the late involvement of HAS consultants in most cases;
- the difficulty to approach HAS consultants (availability constraints and complex procedures);
- the non-transparent way that published standards are assessed for citation in the Official Journal of the European Union (OJEU) within the European Commission.

The relevant standards for the lawn and garden industry are mostly developed via the international standardisation bodies ISO (Vienna Agreement) and IEC (Frankfurt Agreement). The procedures for the standardisation committees are fixed, clear and transparent for all participants.

However, in general, HAS consultants do not have the means to attend the many meetings that are required to develop a standard from start to finish. This results in HAS consultants often only managing to issue their comments at the final stages of a standard's development. This submission at the end of the process is highly disruptive and usually requires working group members to arrange hastily convened meetings that had not originally been foreseen in order to resolve the HAS consultant's comments on text that was agreed by experts much earlier in the process. These additional meetings add to the already considerable cost and time commitment of the global participants and cause delays to the development of standards. An additional disruption that is sometimes introduced due to the late involvement of HAS consultants is the need for further testing of products to enable the impact of changes to be assessed and verified, which adds further cost and burden to the process. EGMF feels that earlier participation of HAS consultants would avoid this late disruption and urges that they be allowed to participate in the development of standards at an earlier stage.

Once agreement is reached with the HAS consultant, the European Commission usually cites the harmonised standard in the OJEU; however, this approval procedure and process, including the timeline, are not clear and transparent to the public. EGMF would like to see this process being more transparent.



Having a harmonised standard approved and cited in the OJEU also requires the appropriate transition time to make it applicable for use. EGMF believes that this transition time should be based on the transition time as approved by the responsible standards committees, which takes into account the time for designing and/or upgrading products to meet the requirements, as well as the necessary compliance testing (sometimes with third-parties) We understand the need and benefit of having a default of 18 month transition time but urge that the European Commission takes into account the transition time indicated by the relevant committee when coming to a decision.

It is of utmost importance for EGMF members that harmonised standards are published in a timely manner following the deployment of the draft standard by the ESOs, taking into account the appropriate timing for application in view of the technical changes required to products, as well as the increasingly competitive global environment.

Ensuring the right balance between speed and quality is essential for a well-functioning ESS. Therefore, EGMF generally supports the objective set out in the Roadmap, to improve the governance and working methods within the system in a clearer and more transparent manner than it is the case today.

International dimension of standardisation

One should note that standards development is based on voluntary participation by experts registered with national standards committees. Depending on the technology dealt with in the standards committees, it may be that certain national committees will not have the appropriate experts and expertise available, based on the national industry activities. While it is beneficial to have as many experts as practical from as many national committees as possible participating at international level, this may not always be feasible because of technical and/or economic interests of stakeholders.

EGMF therefore believes that increasing the focus of the international standardisation activities based on political expectations and targets such as the green and digital transformation in Europe may not be appropriate as it may result in a lack of interest of global stakeholders. What could be more appropriate is to use standardisation as a means to deal with the outcomes of global political alignment instead of standards initiating a global agreement on issues covered by the EU Green Deal and the EU Digitisation strategy. EGMF fears that having a standards development programme based on Euro-centric political aims might result in a lack of involvement from our international partners (ISO and IEC). Since the standards for products in the EGMF portfolio are predominantly developed at an international level, we are concerned that the lack of global interest could thwart the development of future standards projects.

Main EGMF recommendations

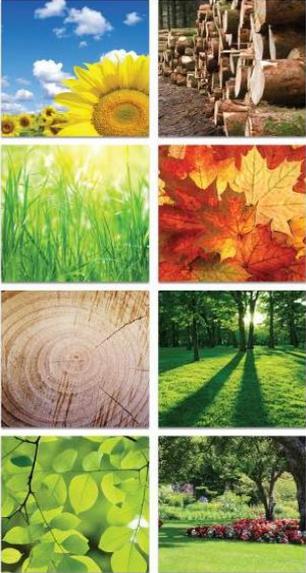
Overall, EGMF and its members are supportive of the ESS and will assist in any activities in view of improvements to the current process. Therefore, we ask that the following recommendations are taken into account in view of developing the future European Standardisation Strategy:

1. Find the right balance in standardisation requests between qualitative requirements set by EU legislation and flexibility for the European Standardisation Organisations required for state-of-the-art standards in order to preserve the New Legislative Framework;
2. Publish clear criteria for a common technical evaluation of harmonised standards to align expectations between the European Commission and standardisation experts
3. Ensure timely processing for citation of new harmonised standards in the Official Journal of the European Union;



4. Propose early participation of HAS consultants during standards development process;
5. Ensure the EU political targets related to the green and digital transformation are in line with and supportive of industry needs.

For further information, please contact: EGMF Secretariat, secretariat@egmf.org



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. www.egmf.org

