



European Garden Machinery Federation

ACTIVITY
REPORT
2015



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Word from the President



Dear colleagues,

First I would like to express my and indeed all EGMF members' gratitude to my predecessor Hartmut Fischer. Unfortunately (for us) he had to leave the EGMF Board to take up an exciting challenge within his company. We can only be grateful for the time, dedication and energy he ploughed into EGMF for more than 10 years.

The past 12 months were both very busy and eventful. After 15 years of service, our Secretary General Guy van Doorslaer took his well-deserved retirement with the satisfaction of having helped EGMF develop over the years. We thank him for his work and achievements and wish him all the best for the future.

Our association has indeed grown steadily, both in activity and in members. Last year, we integrated external technical assistance to support the activities of our Technical Committee and its 9 Task Forces. With over 50 meetings in 12 months, such additional assistance was necessary to ensure efficient operation of our technical working bodies. I take this opportunity to thank Peter Neckebroeck, former TC Chair, for his successful supervision of EGMF technical and regulatory activities in the past 3 years. This essential part of EGMF work is now very well managed with 2 secretariat staff and one technical desk officer supporting many active company experts. Our Marketing Committee also sought external assistance to undertake its market surveys and it now benefits from the help of a professional marketing firm.

"Communicating more and better on our industry and its achievements"

The decision on technical expertise arose from an in-depth and very useful SWOT analysis. We then continued looking ahead with the preparation of a Vision & Strategy 2020. The purpose is to ensure that our activities match and reflect our members' priorities. The guiding principle remains the same: providing added value to our members. The exercise was carried out hand-in-hand with our National Association members, thus ensuring the involvement of the whole EGMF network. The conclusions provide exciting prospects. In the coming months and years, EGMF will dedicate more time to certain issues, such as support to dealers, e-commerce and skills. We also intend to make ourselves more visible, notably by reworking our corporate identity, taking part in relevant events and communicating more and better on our industry and its achievements. These additional activities will be complementary to the important and necessary technical and marketing work.

EGMF must remain the voice, expert and platform for the garden machinery and outdoor power equipment sector. We hope to be able to attract additional members to consolidate our representativeness.

I personally feel very lucky to be President of EGMF at this point in time. The future looks exciting and I await the pleasure of taking EGMF forward.

Karsten Biber (John Deere)
EGMF President

Economic outlook

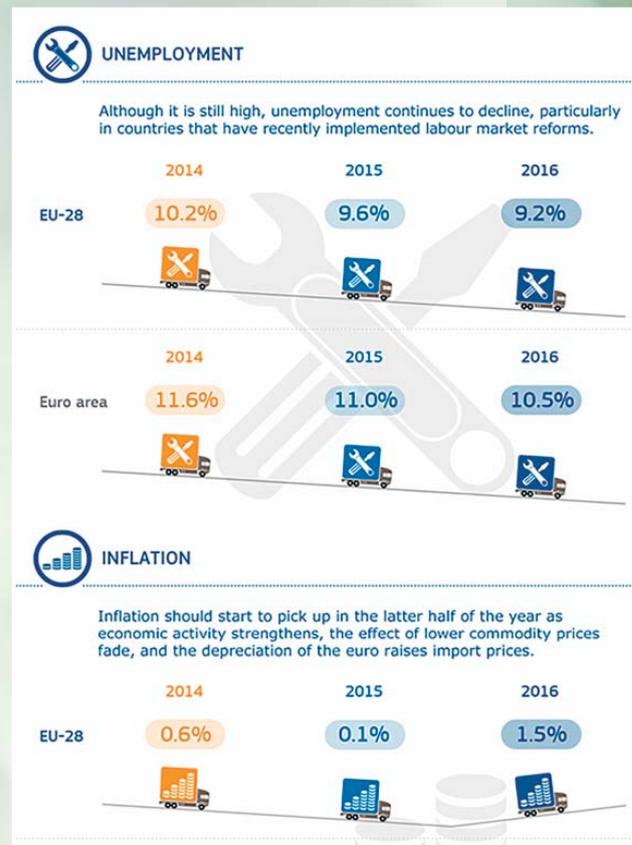
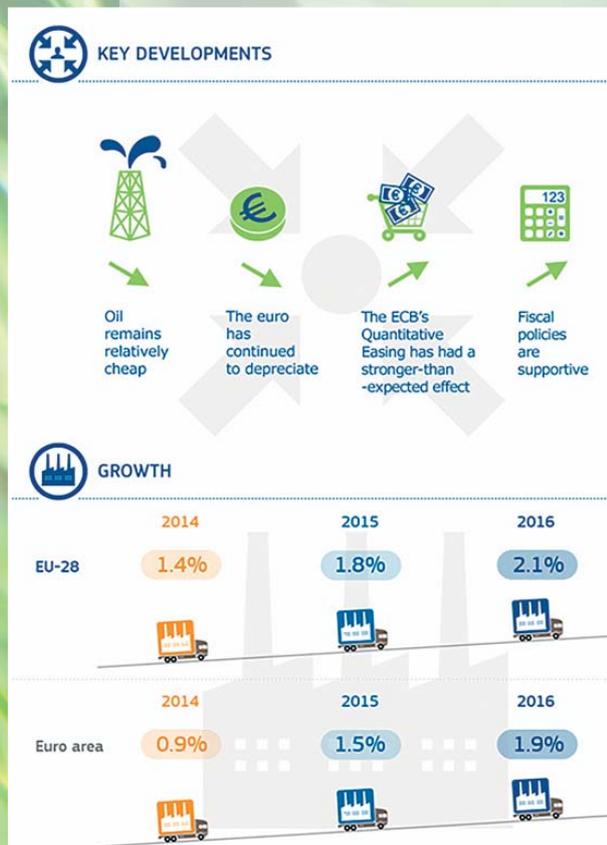
I. Economics

Economic growth in the European Union is benefitting from positive economic tailwinds. According to the European Commission's Spring 2015 Economic Forecast, these short-term factors are boosting an otherwise mild cyclical upswing in the EU.

Europe's economies are benefitting from many supporting factors at once. Oil prices remain relatively low, global growth is steady, the euro has continued to depreciate, and economic policies in the EU are supportive. Real GDP in 2015 is now expected to rise by 1.8% in the EU and by 1.5% in the euro zone. For 2016, the Commission forecasts growth of 2.1% in the EU and of 1.9% in the euro zone.

Overall, in 2014 the number of people employed grew by 0.6% in the euro zone and by 1.0% in the EU, the highest annual growth rates since 2008. Since mid-2013, employment has risen and unemployment has fallen in both the EU and the euro zone. As economic growth strengthens, labour market conditions should improve further. Growth, however, is unlikely to strengthen enough to reduce unemployment rates significantly. Meanwhile, unemployment rates continued to decline over the course of 2014 and during the first two months of 2015.

Inflation in the EU and the euro zone fell in late 2014 and early 2015, dropping below zero in December. Euro zone annual inflation was 0.2% in July 2015, stable compared to June. In July 2014 the rate was 0.4%. European Union annual inflation was 0.1% in July 2015, also stable compared to June. A year earlier the rate was 0.5%.



Source: European Commission

II. Weather outlook

According to the World Meteorological Organization (WMO), 2014 was expected to be Europe's warmest year in at least the past 500 years, surpassing its previous record set in 2007. A very warm winter 2013/14 culminating with a record warm December sealed the deal to make the first ten months of 2014 (January–October) the warmest period since 1880, with anomalies exceeding 2°C in central Europe and parts of Scandinavia. Throughout Europe, November 2013–October 2014, broke the record for the all-time warmest 12-month period in the last 135 years.

For the period October 2013–March 2014, Austria received only 56 percent of average precipitation, marking the driest such period since 1953. The situation changed as spring progressed and some regions in northern and eastern Austria received record monthly rainfall for May. Summer 2014 was 0.2°C higher than the 1981–2010 average continuing with its warmest fall (September–November) since 1767.

United Kingdom had its wettest winter on record from mid-December 2013 through mid-February 2014. The first eight months of 2014 were the warmest and wettest such period since 1910 and then, in a quite abrupt shift, record dryness arrived for the month of September.

In France the temperatures exceeded by 1.2°C the normal average, May and July were below the average temperature, and August was particularly fresh. In 2014, no hot weather was really noticed but less freezing days than the average number were counted. Rainfall exceeded by 10% the average and the sunshine duration was close to normal in almost all the country.

Nordic countries had warmer and wetter spring than usual. Some stations in the northern part of Norway reported more than 200 percent of average precipitation for the season.

Serbia, Bosnia-Herzegovina, Croatia, Romania, Bulgaria, and Slovakia experienced severe flooding in May. In June, August, and September, heavy rains again caused flooding in Bulgaria. In September, southern parts of the Balkan Peninsula received over 250 percent of the monthly average rainfall and, in parts of Turkey, over 500 percent of normal.

In Germany in particular, spring was too warm and too dry and summer was too cold and too wet with an excess of rainfall in July.

Source: National Climatic data center – USA and World Meteorological Organization

III. EGMF Market Outlook (2014)

The survey shows that the EGMF participants sold over 16.2 million units into the European Market (39 countries) in 2014 (15.4 million units in 2013).

-) 8.2 million petrol units (7.9 million units in 2013)
-) 6.1 million corded units (5.9 million units in 2013)
-) 1.9 million cordless units (1.6 million units in 2013)

The early start of the garden season and continuous favorable weather conditions in 2014 resulted in a significant growth of EGMF Volumes into the European market.

Evolution of EGMF Volumes

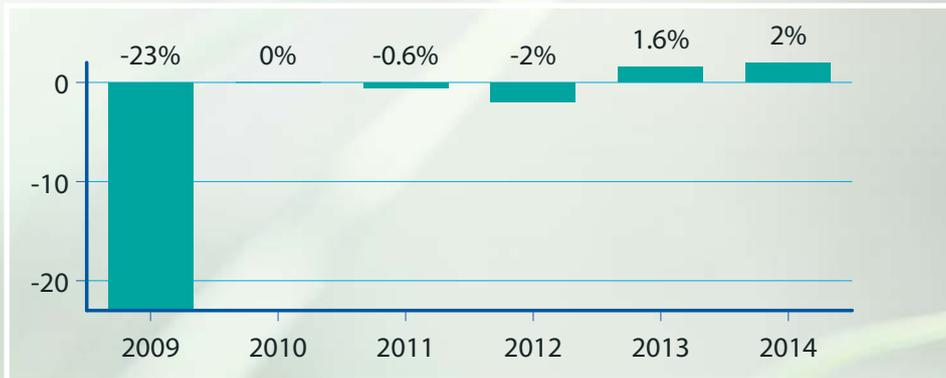
Year-by-year evolution (in %)

Total volumes



Volumes per type of power source

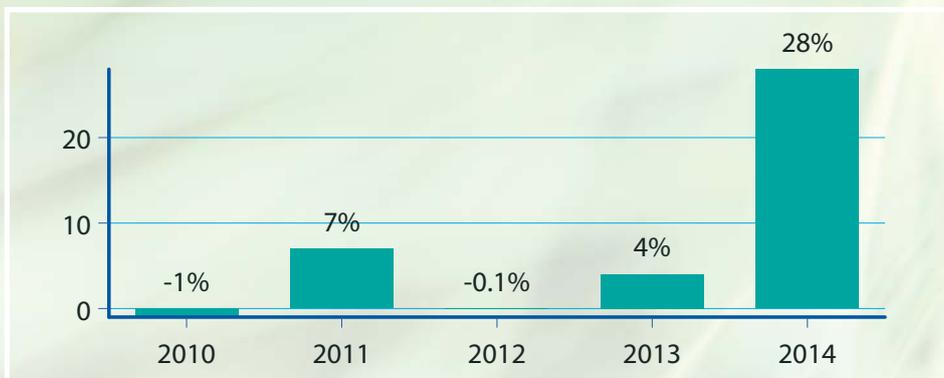
Petrol



Corded



Cordless (excl. robotic mowers)



(EGMF Footprint

I. New members

In 2015, EMAK, Grillo and Ransomes Jacobsen joined EGMF as full members. Discussions are ongoing with other companies with the aim of further reinforcing the representativeness, strength, expertise and structure of EGMF.

It is important to note that

-) A full member is a manufacturer of garden, landscaping, forestry or turf maintenance equipment who is registered in Europe.
-) An associate member is a company which is registered in Europe, having an ancillary activity supporting manufacturing or marketing of garden, landscaping, forestry or turf maintenance equipment.

EGMF membership is open to all companies manufacturing in Europe. For competition law reasons, membership cannot be refused to companies fulfilling the membership requirements.

II. Cooperation with National Associations

EGMF has seven National Association members who are the voice and the guardians of the garden machinery sector's interests at national level. They are an important pillar of the structure because they notably represent the smaller companies in the sector, and they are the main contact point for national authorities and national standardisation bodies. Their regular updates on national market trends, their contributions to EGMF statistics and their regulatory expertise are of great benefit to EGMF and all its members.

EGMF is keen to ensure that cooperation with its National Association members is optimal. To this end, a dedicated meeting took place in March 2015 and gave an opportunity to exchange on national issues and activities and discuss potential new areas of cooperation (e.g. attracting skilled technicians, dealer network, e-commerce). The outcome fed into the EGMF Vision & Strategy 2020.

III. Cooperation with EU trade Associations

EGMF maintains regular contacts and close cooperation with many fellow sector associations in mechanical engineering. This is notably the case with EPTA - the European Power Tools Association - on issues such as Ecodesign and carbon footprint, and with EUROMOT - the European Association of Internal Combustion Engines - on emissions from non-road mobile machinery and the International Internal Combustion Engines Manufacturers Association (IICEMA).

EGMF also cooperates with CECE (construction machinery), CEMA (agricultural machinery), EUnited Municipal Equipment and FEM (materials handling equipment) on the subject of Road Circulation (harmonisation) and Exhaust Emissions (review and implementation) in two cross-industry working groups, ITF Road Circulation and ITF Non Road (emissions).

EGMF works very closely with Orgalime - the European Engineering Industries Association - notably through its associate membership status that provides privileged access to Orgalime members, staff, regulatory analyses and documents (e.g. the Orgalime newsletter), restricted working groups on important issues (e.g. resource efficiency) and fora with top-level European decision-makers dedicated to relevant policies for the engineering sectors.

EGMF is, of course, serviced by the Orgalime Partnership which has been providing General Secretariat administration, legislative monitoring and advocacy services for many years.

IV. Cooperation with non-EU Associations

A. OPEI (USA)

EGMF maintains a close relationship with OPEI through regular contacts and direct participation in annual meetings. OPEI takes part in one of the yearly meetings of the EGMF Technical Committee, thus ensuring exchange of regulatory information. It also cooperates with the EGMF Marketing Committee.

B. International Internal Combustion Engines Manufacturers Association (IICEMA)

EGMF is involved in the International Internal Combustion Engines Manufacturers Association (IICEMA). The EGMF President attended the last meeting that took place in October 2014 in Chicago and during which a formal Memorandum of Understanding was signed by the nine participating associations from China, Europe, India, Japan and the US. EGMF is part of the Steering Committee and is involved in two working bodies: the Universal Emissions Labelling System Working Group and the Lawn, Garden & Utility Vision Development Working Group, which it chairs. The next annual meeting will be in mid-November 2015 in Tokyo.

Governance

I. Organisation

A. Governing bodies

Karsten Biber (John Deere) became President and **Wolfgang Simmer** (VIKING) Vice-President in October 2014 for a period of two years.



EGMF Board 2014-2016

Karsten Biber, President (John Deere, left above)

Wolfgang Simmer, Vice-President (VIKING, right above)

Hartmut Fischer, Past President (STIHL)

Andreas Andorfer (Bosch Lawn & Garden)

Raimondo Hippoliti (GGP)

Charles Moll (MTD)

Martin Sanders (Honda)

Eric Stegemyr (Husqvarna)

Johan Surkyn (Toro)

Patrick Vives (Etesia)

The 2014 EGMF Annual meeting and General Assembly took place in Ipswich (UK) on 1-2 October 2014. They were kindly organised by AEA and hosted by Ransomes Jacobsen. The next Annual meeting will take place on 12-13 October 2015 in Strasbourg, hosted by Etesia.

B. Working bodies

1. Technical Committee

Fabio Ricci (FederUnacoma) succeeded **Peter Neckebroeck** as the Technical Committee (TC) Chairperson in July 2015. **Maria Tittel** (STIHL) is Vice-Chair.

The TC now counts 7 active Task Forces (TFs) and 2 workinggroups (WG). These held more than 50 meetings altogether between October 2014 and October 2015. Terms of reference for the TC and its TFs have been established so that their scope and aims are clear. The TC and all TFs are supported by the Technical Desk Officer and the Secretariat. They represent altogether the largest share of EGMF activities.



Fabio Ricci



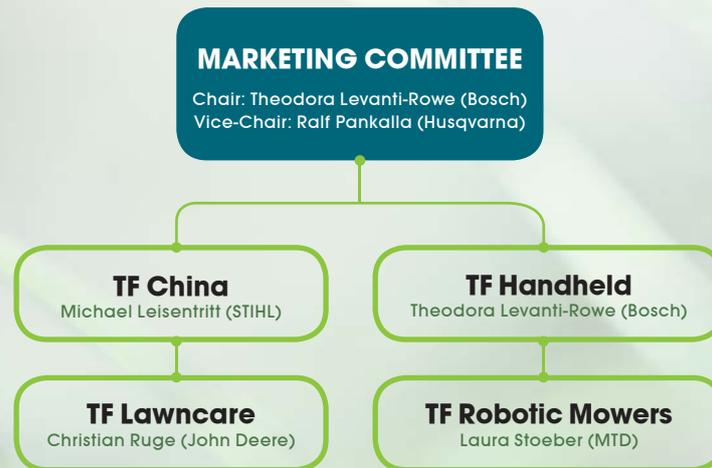
2. Marketing Committee

Theodora Levanti-Rowe (Bosch) is the Marketing Committee (MC) Chairperson and **Ralf Pankalla** (Husqvarna) the Vice-Chair.

The MC counts 4 Task Forces (TFs): Handheld Tools (Chainsaws, Linetrimmers / Brushcutters, Power Tools, Garden Vacs and Hedgecutters), Lawncare Tools (Riding Lawn Equipment, Walk-behind Lawnmowers, Scarifiers, Tillers and Shredders), China and Robotic Mowers. The major activity of the MC is to run bi-annual market surveys.



Theodora Levanti-Rowe



C. Secretariat

The EGMF General Secretariat is managed by the Orgalime Partnership. Several professionals provide support to EGMF and its governing and working bodies on a daily basis.

Technical assistance is provided by a Technical Desk Officer, who is involved in the work of the Technical Committee and its Task Forces.



Paul Wilczek
Secretary General
(incoming)



Anne-Claire Rasselet
Regulatory matters
(environment & energy)



Ioana Smarandache
Regulatory matters
(internal market)



Janet Almond
Administrative support



Alina Burlacu
Support to Marketing
Committee



Mark Rubenstein
Technical Desk Officer

II. Vision and Strategy 2020

Following the SWOT analysis carried out in 2013-2014, the EGMF Board decided to work on a “2020 Vision & Strategy” to review and explain its priorities in the medium term, in view of the internal and external challenges ahead.

To this end, the Secretariat prepared a detailed survey, which was circulated to member companies. The feedback received was put together in a report highlighting members’ medium term challenges and priorities. National Association members were also involved and presented their national plans and priorities. A specific brainstorming meeting then took place in early March and eventually led to an internal document that sets out the EGMF vision, mission and strategy 2020. Together with ongoing technical, marketing and international activities, it will be the basis of EGMF work in the medium term.

(EGMF 2020

● Our Vision

-) Our customers are key to our industry
-) Our society is more demanding in terms of the environment
-) Our European market is growing and open to global competition
-) Our sector must take part in and benefit from the 2020 sustainability agenda

● Our Mission

-) Be the voice, expert and platform for the sector

● Our Strategy

-) Combat unfair competition from non-compliant and counterfeit products
-) Proactively promote sensible, proportionate and harmonised EU and international requirements
-) Place the industry on the sustainability agenda
-) Monitor e-commerce and support dealers with information and training programmes with national associations
-) Develop, with national associations, initiatives to cover the shortage in skilled technicians
-) Continuously develop and increase the effectiveness of our PR and lobbying

(Regulatory and advocacy activities

I. Internal Market

A. Machines Safety Machinery Directive 2006/42/EC (MD)

At its Technical Committee meeting on 3-4 December 2014, EGMF set up a sub-group of its Machinery Task Force, entitled "EGMF Technical eDocumentation Working Group" which replaced the former Technical e-instructions Working Group.

The Technical eDocumentation Working Group held several WebEx meetings (12 February, 29 May, 6 July) and one face-to-face meeting in Brussels (31 March 2015). The mission of this Working Group is to exchange views about the effectiveness of the current instructions and provide innovative solutions to improve the delivery of the information in the instructions. The Working Group is working towards achieving these objectives in two steps: firstly, providing instructions covering the essential health and safety requirements (EHSR) in the form of a printed "start and safety guide" delivered with the product (the slim guide) and secondly, in the form of a website that gives access to the complete instructions. The overall goal is to prepare the ground for the forthcoming revision of the Machinery Directive 2006/42/EC, particularly in terms of the requirements on instructions. The revision process will start in the autumn of 2015 and run for 5 years. The legislative proposal on the revised Machinery Directive is therefore expected in 2020.

In terms of specific actions, the EGMF Technical eDocumentation Working Group finalised its position paper on the above-mentioned proposals in July 2015. The Working Group members also contributed to a survey document listing the elements that each instruction manual, as laid down in the Machinery Directive should contain and whether these are safety issues or not. EGMF also elaborated a survey to ask Working Group members about the total number of clicks received on their company websites, and if these clicks are related to instructions and their download. These surveys are under ongoing analysis.

In addition, the Working Group is planning to further collaborate with EUnited Cleaning with a view to building common messages on e-instruction requirements. A first joint conference call between the EGMF Technical eDocumentation Working Group and EUnited Cleaning took place on 10 July 2015.

On the general activities related to the Machinery Directive, EGMF attended the Machinery Working Group meeting on 23-24 March and closely monitored the following issues: cutting attachments for portable handheld brush-cutters (Italian paper), lawnmower standard EN ISO 5395-2:2013 and -3, top-handle chainsaws, and ROPS for ride-on machines (above 400 kg and less than 600 kg).

B. Outdoor Noise Directive 2000/14/EC

Since the last quarter of 2014, EGMF activities on the Outdoor Noise Directive (2000/14/EC) have significantly increased. The EGMF Noise TF produced several positions and held numerous internal discussions. It also participated in meetings organised by the European Commission following its launch of the standalone review process of this important piece of legislation.

EGMF issued a general position paper on the review process and participated in EC Noise Expert Group meetings. In addition, EGMF addressed a letter to the Commission as an answer to its working document, which examines options for the OND review.

Primarily, EGMF calls for self-certification for all product categories as well as effective and proactive market surveillance. The letter and position paper also provide EGMF views on key issues to be addressed, notably conformity assessment procedure, labelling, database, and measurement methods.

Subsequently, EGMF actively contributed to the study on scope and noise limits, providing comments and meeting with the consultant. Launched in April 2015, this study is conducted by a consortium called ODELIA, under the lead of TNO. This Dutch organisation was involved in the NOMEVAL study (2007).

EGMF recommended keeping current limits and maintaining the current classification split between products for which fixed noise limit values apply (listed in Article 12) and products that need only to be labelled (listed in Article 13). However, the first intermediate report went the opposite way. In fact, ODELIA suggested setting new noise limits for almost two-thirds of equipment currently subject to marking requirements only (Article 13), including many types of lawn and garden equipment. It also tabled stricter noise limits for half of the current Article 12 equipment.

Therefore, the EGMF Noise TF raised detailed comments on the study methodology as well as individual types of garden machinery. In addition, it closely followed the outcome of the final study report.

It is not expected that the level of activity will decrease in the coming years: this is just the beginning of the review process. As regards next steps, the ODELIA conclusions will be used as input for the impact assessment to be launched in 2016 or 2017. The Commission expects to table its proposal in 2018, with the new legislation being applicable from 2020/2021.

C. Non Road Mobile Machinery (NRMM)

1. Exhaust Emissions from NRMM - Directive 97/68/EC

Further to the publication of the Commission proposal on the revision of Directive 97/68/EC on exhaust emissions from non-road mobile machinery, the European Parliament (Environment Committee) and the Council Working Party Technical Harmonisation (Motor Vehicles) started discussions in early 2015. The legislative process advanced smoothly at the Council level. The last Working Party meeting in mid-June paved the way towards the conclusion of the Council 'general approach' agreed during the meeting of the Committee of Permanent Representatives (COREPER) on 30 June. The adopted text is the basis for the negotiations between the Council and the Parliament to reach a first-reading agreement by the end of 2015.

At the European Parliament level, the lead committee on this file is ENVI (Environment) and the appointed rapporteur is Elisabetta Gardini (EPP, IT). The ENVI draft report was published on 7 May, followed by the publication of amendments on 10 June. In parallel with the ENVI discussions, the IMCO (Internal Market) Committee, selected as the opinion committee on this file, issued its draft opinion in March 2015 (rapporteur: Jiří Pospíšil, EPP, CZ). The IMCO amendments published in mid-April 2015 were approved in IMCO on 23 June.

A new Working Group under the EGMF Environment Task Force, entitled NRMM CI Engines, was established at the EGMF Technical Committee meeting on 3-4 December 2014. This Working Group released a position paper on the NRMM proposal, pointing out the specific concerns of garden machinery manufacturers who use compression ignition engines in the power categories 19-56 kW, particularly regarding the transition period proposed by the Commission.

On the basis of the discussions during a WebEx meeting of this Working Group on 7 April, the final position paper, accompanied by a letter, was submitted to the ENVI and IMCO rapporteurs, the shadow rapporteurs from the other political groups, other key MEPs from both the ENVI and IMCO Committees, as well as to the Commission and the Member States. A key request outlined in the position paper is an extension of the 18-month transition period by 12 months for production, and 6 additional months for the placing on the market, to be authorised as an exemption for lawn and garden equipment producers using CI engines between 19 and 56 kW. The current transition scheme will result in substantial redesign constraints, because of both the seasonal use of EGMF products and the technological gaps. To meet the Stage V requirements, the OEM must accommodate a new technology of a common rail fuel injection system, and machines will need to be equipped with a diesel particulate filter.

Both the ENVI draft report and the IMCO opinion proposed an extension of the transition period by 6 months, in other words 24 months in total. The CI Engines Working Group submitted a voting opinion to IMCO MEPs on 6 May, supporting the extended transition period and the inclusion of a replacement engines provision without a time limit. The Working Group's request for a longer transition period as set out in the position paper (36 months in total) was reaffirmed in the EGMF proposal for amendments on the ENVI draft report, sent on 4 June 2015. Additional arguments for the extension of the transition period (low environmental impact and major technical issues for manufacturers) were annexed to the position paper in a separate document, distributed to the ENVI rapporteur on 23 June.

Two delegates of the EGMF NRMM CI Engines Working Group scheduled a meeting with Ms Elisabetta Gardini on 26 June, to further defend the position paper. Following the publication of the ENVI amendments on 10 June, a joint WebEx meeting of the EGMF Task Force Environment and its Working Group NRMM CI Engines was held on 1 July to consolidate the EGMF voting opinion on the ENVI amendments, in view of the ENVI vote on the Gardini draft report and tabled amendments on 15 September.

2. Road Circulation

In early 2015, the European Commission mandated ECORYS to carry out an impact assessment study on the harmonisation of road circulation requirements for mobile machinery. In March 2015 ECORYS published the study's Terms of Reference which consist of the policy options envisaged for a possible future road circulation regulation, the main objectives and the methodology of the study.

The EGMF Road Circulation Task Force is part of the ITF Road Circulation group together with CEMA, CECE, FEM and EUnited Municipal Equipment. In view of the road circulation study, the ITF associations prepared a joint position paper that was presented to ECORYS during a stakeholder workshop on 24 June. Before this workshop,

ECORYS requested feedback from individual stakeholders via a scoping questionnaire submitted in early May 2015. As EGMF products were not initially considered in the questionnaire, EGMF met ECORYS on 5 May and requested the extension of the study's scope to include ride-on mowers and garden tractors which occasionally circulate on roads.

EGMF has aligned its priorities to those of the other ITF associations, pursuing self-certification as much as possible for the whole vehicle type-approval, and third-party certification for systems and components. The EGMF Road Circulation Task Force has actively participated in the ITF meetings and conference calls in 2015, in order to have a common industry voice on the necessary harmonisation of road requirements.

To collect data on the cost of Member States' national legislation in relation to safe road circulation of mobile machinery, ECORYS launched its draft pilot survey after the stakeholder workshop in June. Stakeholders were consulted on the draft survey until the end of August 2015. ITF asked ECORYS to focus not only on costs but also on the benefits of harmonisation, as the EU could become a benchmark for other external markets. The study is intended to be concluded by mid-2016.

D. Robotic Mowers

The EGMF Robotic Mowers Task Force published the boundary wire guideline and the "Boundary Wire Mark" compliance sheet on the EGMF website in December 2014. Several WebEx meetings of the Task Force have taken place in 2015 to review the EGMF "cutting performance standard" aimed at standardising performance evaluation of robotic mowers.

The Robotic Mowers Task Force continued monitoring all relevant developments related to the Radio Equipment Directive (R-ED) 2014/53/EU, because robotic mowers are included in the scope as short-range devices (SRD) below 9 kHz. ETSI has been interacting with EGMF for the development of a revised radio wave standard to cover SRD below 9 kHz. The standard is of crucial importance to robotic mower manufacturers, as it ensures their compliance with the R-ED.

To contribute to the elaboration of the standard, EGMF Task Force members sent their current frequency spectrums to ETSI in June 2015. EGMF has applied for six-month membership of ETSI (applicable from 1 July 2015), which would allow it to participate in ETSI meetings and access relevant documentation, particularly in terms of the process of drawing up the revised standard.

E. Standardisation Policy / INGRESS

A multi-industry stakeholder INdustry GRoup on European Standardisation Strategy, called INGRESS, was initiated as a consensus-building platform representing the interests of industry stakeholders on standardisation policy issues. The primary objective of INGRESS is to be granted the observer status in the Committee on Standards (CoS) of Regulation EU 1025/2012 on European Standardisation. The INGRESS secretariat is managed by Orgalime.

EGMF was invited to be part of this alliance, and thus joined INGRESS, further to the approval of the EGMF Technical Committee on 1 April 2015. The EGMF technical officer is acting as the EGMF delegate in the INGRESS meetings, and report on the INGRESS activities. EGMF attended the second meeting of INGRESS on 20 April in Brussels. The latest meeting took place on 2 October 2015.



II. Market Surveillance

A. EGMF Compliance guides

EGMF published six compliance guides in January 2015: 1- ICE lawnmowers; 2- electric lawnmowers; 3- ride-on lawnmowers; 4- brushcutters; 5- tillers; 6- chainsaws. As a reminder, EGMF engaged in this exercise in order to assist market surveillance and border control authorities in checking the conformity of various garden machinery equipment entering the EU market.

EGMF invited its national associations to make use of the compliance guides, translate them into their own language, and promote them to the national authorities (customs, market surveillance). The compliance guides are publicly available on the EGMF website in English, German and Spanish. EGMF also informed DG GROWTH in the European Commission about the publication of these guides.

The EGMF Market Surveillance Task Force is currently investigating the possible publication of compliance guides on the following products: lawnmowers (electric), lawnmowers (electric), chainsaws (electric), blower/vacuums (ICE and electric), shredders (ICE and electric), hedgetrimmers (ICE and electric), robotic mowers.

On customs matters, in March 2015 two monitoring sheets were discussed within the Market Surveillance Task Force. The first refers to a request by French customs to have the safety test report according to EN ISO 5395 for ride-on lawnmowers with seated operator, sold by GGP Italy. The second relates to Turkish customs requesting a declaration of identity for an electric pedestrian lawnmower, from a Notified Body, with the specification that the model name is identical to the type name listed in the test report.

B. Product Safety and Market Surveillance Package

Following the launch of an impact study in January 2015 concerning the mandatory “country of origin marking” provision in the proposal for a Regulation on Consumer Product Safety (CPSR), the EGMF Market Surveillance Task Force answered the questionnaire and submitted it to Orgalime ahead of its interview with the consultant. Most participating companies considered that marking of origin would not necessarily improve safety and traceability. Moreover, specific cost estimates for the introduction of a “country of origin” mark cannot be given without knowing the proposed rules for determining the country of origin.

The final report of the study published on 6 May excluded from the scope manufacturing goods, including garden machinery, and therefore focused on only six product categories for which the impact of country of origin labelling was believed to be meaningful: toys, domestic appliances, consumer electronics, textiles, footwear and ceramics. EGMF therefore did not provide further input on this issue.

C. Blue Guide

The Commission launched the process for the revision of the Blue Guide in January 2015, and started consulting stakeholders on the 2014 version in April. EGMF closely followed this issue via Orgalime and provided comments during the consultation period, to be integrated into the final Orgalime input to the Commission. The updated Blue Guide document was published on 20 July 2015. Minimal changes were made to the text compared to the 2014 version, thereby not affecting the overall content of the Guide.

III. Energy and Environment

A. Ecodesign / ErP (Energy related Products)

1. Ecodesign Working Plan 2015-2017

In 2014-2015, the EGMF Ecodesign Task Force actively monitored the study to establish the future EC Ecodesign Working Plan, which was launched in January 2014. It will list priority equipment to be subject to Ecodesign studies for the period 2015-2017.

During 2014, EGMF members were particularly concerned about the outcome of draft reports, as lawn and riding mowers, as well as handheld power tools, were selected amongst the first product groups.

EGMF opposed the possible inclusion of this equipment in the next Ecodesign Working Plan. We particularly questioned potential improvements and energy savings, considering that garden machinery is already regulated by a significant amount of legislation. EGMF attended the second stakeholder meeting (29 October 2014) to defend its positions and continued monitoring developments. EGMF actions were rewarded since lawnmowers and handheld power tools were removed from the final draft list of priority products. However, high pressure cleaners (HPC) were included as a last-minute change.

In addition, the consultant suggested a horizontal Ecodesign measure on internal combustion engines, since the NRMM Directive does not address energy savings. EGMF and other machinery industry associations (Euromot, CECE, CEMA and FEM) issued a joint position paper raising concerns about this measure. EGMF argued that the variety of types and power ranges of combustion engines installed in non-road mobile machinery makes such a measure barely feasible. In addition, the pressure imposed by other upcoming regulatory requirements on engines renders it inappropriate. Furthermore, the importance of energy efficiency in manufacturers' R&D makes such a measure unnecessary.

The Ecodesign Task Force will keep track of the final study report and its recommendations, which were expected in early 2015. The final decision on the list of priority products to be included in the Working Plan 2015-2017 remains with the European Commission but has been on hold for several months.

2. Fans

The EGMF Ecodesign Task Force carefully monitored the review of the Ecodesign Regulation (327/2011) on fans driven by motors with an electric input power.

The Task Force analysed the reports and suggestions issued in the context of the review study carried out by VHK. The suggested changes confirmed the exclusion of fans used in leaf blowers (currently included in the Ecodesign Regulation on vacuum cleaners).

On the basis of the final study report (March 2015), the Commission issued a proposal to review the Ecodesign Regulation on fans. It suggested a new wording for the exemption of fans used for motor cooling purposes. It needs to be noted that, as a consequence, fans used in lawnmowers and other garden equipment might fall under the scope of the revised Ecodesign measure. Indeed, fans included in some products and which do not have the sole purpose of cooling the motor would no longer be exempted.

The Ecodesign Task Force will continue monitoring future developments, notably the adoption of the revised Regulation. The publication of the revised Ecodesign Regulation on fans is expected at the end of 2015.

B. Resource Efficiency / Circular Economy

The European Commission is planning to table by the end of 2015 an ambitious Circular Economy Package aimed at covering the entire value chain. The Package will be comprised of a Commission Communication setting out an Action Plan on the Circular Economy and a revised legislative proposal on waste policy. In preparation for these policy initiatives, the Commission launched a stakeholder consultation which ran until 20 August.

The EGMF Task Force Environment actively contributed to the circular economy discussions in view of the public consultation. A WebEx meeting was held on 22 July 2015 to prepare EGMF's input to the Orgalime comprehensive paper on the circular economy and the Orgalime response to the questionnaire. EGMF supported the Orgalime position and provided additional comments on issues which needed reinforcing in the response to the consultation: stressing the international dimension of the circular economy concept to be enforced beyond the EU in order to ensure a level playing field for all manufacturers (EU and non-EU); focusing on public incentives for more durable products and exploring the potential of green public procurement; and, last but not least, enhancing consumer awareness and education about the benefits of durable products, which is critical for the transition to a successful circular economy.

These comments were duly taken into account in the final Orgalime contribution to the public consultation submitted to the European Commission on 4 August 2015.

IV. Substances and Waste

A. REACH Regulation 1907/2006 - Registration, Evaluation, Authorisation and Restriction of Chemicals

The EGMF Chemicals and Waste Task Force has continuously monitored REACH implementation, notably authorisation and restriction processes. The EGMF monitoring tool "Hazmat Radar" tracks substances under consideration in various REACH processes and identifies whether, and to what extent, they are used in garden machinery. This tool allows companies to be kept informed and to adapt their internal policy and production.

In October 2014, the EGMF Chemicals and Waste Task Force issued a position paper calling for the implementation of the "repair as produced principle" in REACH implementation, especially restriction and authorisation. This was used as input to the discussions on the impact of REACH obligations on the availability of spare parts. As a main result, the Commission announced that an interim solution will be tabled by the end of 2015: longer transition periods (i.e. extending sunset dates for 3 years) will be granted for the use of substances subject to authorisation in spare parts. As a long-term solution, a simplified application for authorisation will be put in place, for example for low volume applications.

The Chemicals and Waste Task Force monitored the implementation of Article 33, which triggers communication obligations for garden machinery manufacturers. The Task Force has carefully followed new developments on the substance concentration threshold (0.1% w/w) for SVHC in articles: the European Court of Justice is preparing a judgement on this issue. Depending on the final Court of Justice ruling, article producers might have to manage a bigger quantity of information up and down their supply chain on the presence of SVHC at component level, rather than the whole article as currently applied.

B. RoHS Directive 2011/65/EU - Restriction of Substances in Electric & Electronic Equipment

1. Scope review

In the past months, the Chemicals and Waste Task Force carefully followed the upcoming Commission proposal amending the scope of the RoHS2 Directive (Articles 2.2, 4.3 and 4.4).

Based on the Öko-Institut report (July 2014), the upcoming scope review aims at clarifying that the restrictions will apply on equipment newly covered (e.g. petrol equipment with an electrical function) from 22 July 2019. The second objective is to reflect the spirit of the law by safeguarding the availability of spare parts for equipment placed on the market before the entry into force of a substance restriction, and hence their reuse and refurbishment. Therefore, the Commission proposal should also clarify that spare parts benefit from an exemption for equipment newly in scope placed on the market before 22 July 2019.

At the end of 2014, an EGMF delegation met DG Environment to discuss ongoing issues related to RoHS2, including the scope review. EGMF suggested clarifying that new products may fall under existing categories (Annex I), but need to comply only as of 22 July 2019. For example, petrol lawnmowers fall under category 6 but will need to comply with substance restriction only as of July 2019.

The Commission intends to table its proposal by the end of 2015. Subsequently, discussions will start in the European Parliament and the Council. The Task Force will continue monitoring this issue.

2. New substances banned under RoHS

At the end of 2014, the Commission tabled a proposal to further restrict 4 new phthalates (DEHP, BBP, DBP and DIBP) under the RoHS Directive. This required the attention of the Task Force.

The Commission proposal did not include an exemption for spare parts, which is needed to repair or reuse EEE placed on the market before the entry into force of this new restriction. As main consequences, manufacturers would have been obliged to destroy the existing stock of spare parts, develop new ones with alternatives or stop providing spare parts. Therefore the Chemicals and Waste Task Force, together with Orgalime, worked on the introduction of a spare part exemption in RoHS Annex II, which was successful.

Published on 4 June 2015, Commission Delegated Directive 2015/863 restricts the use of the 4 phthalates as of 22 July 2019. Specific types of equipment (categories 8&9), such as monitoring and control instruments, will benefit from a longer transition period of 2 years.

3. Successful industry cooperation to renew RoHS exemptions

EGMF and many other industrial sectors cooperated through a cross-industry platform to prepare joint application dossiers to renew RoHS exemptions expiring in July 2016.

Amongst the 16 dossiers tabled between October 2014 and January 2015, EGMF co-signed 9 applications for the renewal of RoHS2 exemptions (6(a)(b)(c), 7(a), 7(c)-I-II-IV, 15 & 34) related to the use of lead in various applications. The Chemicals and Waste Task Force was particularly involved in the renewal application for exemption 6c on copper alloy containing up to 4% lead by weight. Subsequently, the Task Force followed the technical evaluation process of application dossiers and EGMF co-signed additional documents providing further evidence and clarification.

As regards next steps, the Commission decisions on renewal applications will be taken between July 2016 and January 2017 (instead of January 2016) due to the very large number of applications. Meanwhile, existing exemptions remain valid, even after the expiry date, until a decision is made publicly available. The Task Force will continue monitoring future developments.

V. Other Issues

EGMF has continuously monitored a number of issues for the purpose of keeping itself up-to-date on developments, without taking any specific actions. Those that received most attention from the members are:

-) The conflict minerals proposal
-) Waste policy – the WEEE2 Directive and ongoing studies; the French decree on the Triman logo / waste-sorting instructions.

Annex I - List of members

Full Members

Andreas Stihl
Belrobotics
Blount
Bosch Lawn & Garden
Briggs & Stratton
Countax
Emak
Etesia
F Robotics Acquisitions
GGP
Grillo
Hitachi
Honda
Husqvarna
John Deere
Kubota
Makita
MTD Products
Pellenc
Positec
Ransomes Jacobsen
Stanley Black & Decker
Toro
TTI
VIKING
Zucchetti Centro Sistemi

National Associations

AEA (UK)
AGROTECHNIEK (Netherlands)
ANSEMAT (Spain)
AXEMA (France)
FEDAGRIM (Belgium)
FEDERUNACOMA (Italy)
IVG / FGR (Germany)

Associate Members

General Transmissions
Hydro-Gear
Kawasaki

Status September 2015

Annex II

EGMF Officers 1998-2015

Year	Annual Meeting Venue	President	TC Chairman	MC Chairman	Secretary General
1998	Cologne	Gregor Wolf	David Lambert	-	Adrian Harris
1999	Cologne	Peter Ginger	"	-	Guy Van Doorslaer
2000	Cologne	Tony Bourke	"	-	"
2001	Strasbourg	"	"	(Joe Weegenaar)	"
2002	Bruges	Nikolas Stihl	"	Thierry Granjon	"
2003	Amsterdam	"	"	"	"
2004	Luxembourg	"	"	"	"
2005	Budapest	"	"	"	"
2006	Munich	Graham Williams	Hartmut Fischer	"	"
2007	Treviso	"	"	"	"
2008	Oxford	Johan Surkyn	"	Theodora Levanti Rowe	"
2009	Heidelberg	"	"	"	"
2010	Felbach	"	Fabian Gwosdz	"	"
2011	Gothenburg	"	"	"	"
2012	Brussels	Hartmut Fischer	Peter Neckebroeck	"	"
2013	Lammerspiel	"	"	"	"
2014	Ipswich	Karsten Biber	"	"	(Stéphanie Uny)
2015	Strasbourg	"	Fabio Ricci	"	To be elected

Code of Conduct

EGMF believes it is important that its activities are at all times carried out in accordance with the applicable law, especially competition law. EGMF believes that business shall be conducted in an atmosphere of free competition, i.e. on the basis of price and quality. EGMF recognises that competition law intends to stimulate free competition, something which has EGMF's full support. EGMF feels it is important to confirm this by adopting a Code of Conduct. This Code of Conduct shall be binding on all members as well as on other participants when taking part in activities of EGMF. The Code of Conduct aims at providing clear rules to EGMF's members, thus reducing the risk of improper conduct and consequently of fines being imposed.

The following rules shall at all times be respected within EGMF:

CORE PROCEDURES

1. Meetings of a body, committee, working group or other form of cooperation within EGMF shall only take place after the members have been invited to the meeting in writing. The notice inviting to the meeting shall also include the agenda of the meeting.
2. Minutes shall be kept of each meeting as referred to in 1., above; these shall be sent to all members of the relevant body, committee, working group or other form of cooperation. The minutes shall be kept in an organised form for a period of at least 7-10 years.
3. Consultations and discussions in a body, committee, working group or other form of cooperation on the topics on the agenda and other topics, where these are related to the market (i.e. topics that may be of interest for the position and for determining the position of the individual members in competition), shall be limited to the official meeting, of which minutes will be kept.
4. During the consultations as referred to in 3., above, it shall not be decided to discuss certain topics during the meeting subject to the condition that this will not be recorded in the minutes. If such condition is stipulated the chairman of the meeting shall refuse to proceed to discuss the topic in question.
5. Each meeting of a body, committee, working group or other form of cooperation during which market-related topics are discussed, shall be attended by at least one staff member of the association. This staff member will monitor topics that are sensitive from a competition law point of view. If there are doubts about such sensitivities, the topic shall not be discussed until the advice of an expert in the field of competition law is obtained, and this advice is to the effect that the topic may be discussed without any objection, or until the limits to be observed during the discussion are clear.

A. PROHIBITED TOPICS

The following topics are prohibited and out of bounds during meetings of bodies, committees, working groups or other forms of cooperation within EGMF, particularly as far as information on these topics is exchanged between companies which might be considered as competitors:

- Sale prices, rates, (intended) price adjustments, recommended prices, discounts, mark-ups and other price-related topics concerning products or services of member companies;
- Division/sharing of the market, e.g. by allocating a specific geographical area, specific customers or specific groups of customers to specific members;
- Restriction of production or sales;
- Pre-consultations with respect to responses to invitations to tender of potential clients;
- Charging on offer costs of competitors in one's own offer;
- Exchanging market information by the individual members, i.e. information about production, turnover, sales, investments, divestments, R&D expenses and other information, as far as this is related to specific (categories of) products or services, that may be regarded as commercially sensitive information;
- Publishing of the average price or of the price bandwidth within the sector;
- Exclusivity for specific members to represent producers and importers;
- Boycotting specific suppliers or customers;
- Any other topic that could lead to coordination of market behaviour restricting competition;
- Pre-consultations between competitors when responding to invitations to tender (in tender procedures with both public and private purchasers);
- Agreeing that all competitors add a surcharge to their bid (which would then be used for "compensating" the bidding costs of those companies that would not win the tender).

B. TOPICS THAT MIGHT PRESENT A PROBLEM

The following topics might, under certain circumstances, present a problem from a competition law point of view, but especially in a highly concentrated, oligopolistic market (i.e. a market with only few players). This means that these topics shall at all times only be discussed within the context of EGMF in proper consultation with an expert in the field of competition law:

- General terms and conditions of sale and delivery. If these pertain to sensitive competitive parameters (e.g. prices, rates, manner of indexation, on-charging specific costs) or if the use of the conditions is mandatory, the competition authorities may object;
- Restrictions on participating in trade fairs. As a general rule, each company should be free to participate in any trade fair it likes and companies should not be asked to boycott any trade fair. Restrictions to this freedom to participate are only allowed under specific conditions. Collective bargaining by the members of EGMF to obtain a better price or other conditions from the trade fair organisation does not constitute a problem under competition law;
- Schemes for recognition/membership criteria. For as long as recognition or membership of EGMF does not play a decisive part for the potential customer when choosing a product or service, there are no objections to this from a competition law point of view. As soon as the customer does find this important, however, these schemes must satisfy specific criteria;
- The secretariat of EGMF is allowed, in principle, to collect commercial information about individual companies and to make this information available to the members in an aggregated manner. It must in any event be absolutely guaranteed that no information on individual companies can be deducted from this aggregate information. In some countries the national competition authorities will only allow such statistics systems if the collected information can be qualified as sufficiently historical, e.g. (depending on the circumstances) presenting data of at least one year before, and/or if the information is made publicly available.

C. TOPICS THAT DO NOT PRESENT A PROBLEM

The following topics constitute the core business of most of EGMF's activities and discussions and consultations on these topics do normally not present any problem under competition law, provided that the topics mentioned under A. are not touched upon:

- General cyclical economic data and business climate, as long as discussions on these topics do not relate to any individual company's behaviour. These discussions focus on the macro level and do not affect any company's behaviour in the market;
- Lobbying activities relating to general interests in the sector and concentrating on legislation and other public issues which may affect the sector;
- Labour law and social issues. These issues are considered to be irrelevant under competition law;
- Legal issues. These issues are by definition of a general nature, as these will affect any company's business to the same extent;
- Standardisation issues, if (i) the standard-setting procedure is transparent and open for participation by any interested party, (ii) there is no obligation to comply with the standard, (iii) access to the standard is provided on fair, reasonable and non-discriminatory terms, and (iv) any discussions within the standard-setting procedure are restricted to technical aspects. Standardisation is aimed at compatibility of products and at technical progress; this will normally be to the benefit of the end user;
- Safety and health issues. EGMF has an interest in enhancing safety and health with respect to the use of the sector's products;
- Environmental issues. EGMF has an interest in enhancing protection of the environment with respect to the use of the sector's products.



European Garden Machinery Federation

EGMF

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