The European Garden Machinery industry Federation – EGMF – has been the voice of the garden machinery industry in Europe since 1977.

EGMF represents manufacturers of garden, landscaping, forestry and turf maintenance equipment.

EGMF members share with households, municipalities, landscapers and greenkeepers the responsibility for green area maintenance which improves the quality of our lives.

- 25 full members
- 4 associate members
- 7 national associations

18 million units within the European market (39 countries) in 2018

EGMF member companies sold

120,000 people in the EU

EGMF member companies employed over

The unit volumes sold on the European market showed an average growth of 2% in the past five years
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Over the last months, the garden machinery industry has faced an increasingly unstable environment, both on the economic and political stages. European and national elections, rising trade tensions between the US and China and Brexit have been among the issues contributing to an unpredictable future for our industry.

Furthermore, climate change remains the largest challenge for our industry as it strongly affects our business. As an industry close to nature, our success is intrinsically linked to the growth of turf, plants and trees.

Again in 2019, our companies needed to readjust to unusual weather conditions. Some regions recorded their warmest temperatures in February, while other parts of Europe had to cope with high quantities of water in winter. Europe then experienced heat waves in June and the rest of the summer. In line with the strategic priorities put forward by European decision-makers, sustainability and the move towards a climate-neutral future will continue to rank high on our agenda.

In addition, innovation and quality also remain essential elements to adjust to the structural changes of our market. Indeed, growth is currently driven by the increasing demand for battery products and robotic mowers.

In this changing environment, joining forces makes our industry stronger and our association successful. Such collaboration translates into concrete value, with recent successes on regulatory activities regarding the internal market, environment and digitalisation policies. EGMF keeps our companies informed about regulatory developments, defends our interests when legislation is in the making and provides guidance that helps us comply with new obligations. In the last year, working together has also contributed to improving market surveys and developing a new online platform facilitating the collection of data.

The foundations are solid. However, we must take a longer-term perspective and look at the challenges ahead in order to ensure that EGMF and our industry is future-proof. The next months and years will offer many opportunities to seize and challenges to address so that we maintain a dynamic industry in Europe – the backbone of a healthy and prosperous Europe.
Following the registration of its strongest growth in a decade last year, the European economy continues its upward trajectory but at a more moderate pace. Growth slowed in the second half of 2018 and this lasted into the start of 2019, influencing the global economic activity. The weakness in the manufacturing sector, particularly concentrated in the euro area, was impacted by tightened global financing conditions, social and trade tensions, potential policy changes, and uncertainty related to Brexit.

By mid-year the European economy is expected to exceed expectations, mainly due to the improvement in domestic demand experienced in the first quarter of the year. The manufacturing sector will continue to be impacted by trade tensions and the corresponding uncertainty. Central and Eastern Europe have robust growth in contrast to the slowdown in Germany and Italy. Some temporary factors such as the mild winter and stockpiling in the UK ahead of the original Brexit date produced an overall positive impetus.

Following a resilient period, the employment growth in the euro area shows signs of revival and is expected to continue increasing and to near its real potential. Job creation should stabilise once temporary factors and uncertainty recede.

The euro area GDP will reach 1.2% this year (compared to 1.9% in 2018) and is forecast to increase to 1.5% in 2020. The inflation rate has been revised slightly down to 1.4% compared to the 1.6% initially forecast.
Weather review 2019

The garden and outdoor equipment sector faces a seasonal business demand starting in October each year. The success of the year depends very much on whether the climate conditions are favourable for the growth of plants and trees, which in turn has a direct impact on the business outlook in a given year.

The 2018 summer was exceptionally warm and dry, marked by several highest temperatures and drought records, especially in central northern Europe. These conditions, which prevailed in the second half of 2018, continued for some regions of Europe in early 2019.

However, other parts of Europe faced exceptionally wet and cold weather conditions in January 2019. Austria, Switzerland and southern Germany were hit by heavy snow and experienced the wettest January days on record.

Starting as an average month, February ended with unusually warm temperatures throughout Europe. Records for monthly temperature and for the whole winter were broken in various countries, notably in the United Kingdom and Netherlands.

Again in 2019, the first half-year and summer were essentially marked by intense and historic heat waves. We faced high pressure and winds from the Sahara Desert affecting large parts of the continent, leading to the hottest June ever recorded in Europe.

As we turn the page on summer, most of Europe can expect mild conditions, warm spells and a high risk of storms and rainfall in the autumn. Although water is much-needed after the lasting heat, rainfall and downpours on dry ground will increase the risk of flooding.

EGMF market analysis 2018

The bi-annual statistical surveys carried out by the EGMF Marketing Committee show a slight decline in the European market in 2018 contrasting with the overall growth trend in the past years.

This essentially due to the very unusual weather conditions in spring and summer 2018, which were marked by high temperatures and drought records in central and northern Europe.

Our members sold over 18 million units on the European Market (39 countries) in 2018 compared to 18.6 million units in 2017.
Evolution of EGMF volumes

--- Year-by-year evolution (in %) ---

Total volumes

Volumes per type of power source

Petrol

-2009: -19%
-2010: -3%
-2011: 0.3%
-2012: -4%
-2013: 1.4%
-2014: 5.9%
-2015: 1.7%
-2016: 2%
-2017: 4.1%
-2018: -3%

Corded

-2009: -37.5%
-2010: +26%
-2011: +28%
-2012: +24.6%
-2013: +18.3%
-2014: +13%
-2015: +11%
-2016: +9%
-2017: +8%
-2018: +6.5%

Cordlees

-2010: +7%
-2011: +4%
-2012: +28%
-2013: +26%
-2014: +24.6%
-2015: +18.3%
-2016: +13%
-2017: +11%
-2018: +9%
EGMF footprint.

EGMF is an international not-for-profit association established in Brussels. Our membership comprises both companies and national associations from the garden machinery and outdoor power equipment sector.

1 EGMF missions

- To serve as a spokesman for the manufacturers of outdoor power equipment on pan-European matters as well as to be recognised by the key regulatory bodies.
- To provide expertise to stakeholders on technical, marketing and other issues concerning the industry.
- To provide an effective forum for exchange of information and knowledge about our sector and its equipment and services.

2 Cooperation with European associations

EGMF strongly believes in close cooperation with fellow organisations in the mechanical engineering sector. Over the last months, the secretariat engaged in a series of bilateral meetings to identify common issues in our respective working programmes and investigate additional areas for cooperation. Strengthening dialogue and collaboration with other associations, notably EPTA, Euromot CEMA, and EUnited Cleaning is even more important to us since we share common members.

Furthermore, EGMF engaged with two cross-industry working groups, the so-called Industry Task Force (ITF). Building on the successful experience in the past years on the exhaust emissions from non-road mobile machinery, EGMF, together with its industry partners, produced and updated guides concerning the new engine requirements.

In addition, EGMF has driven the work of the Industry Task Force Road Circulation and made significant progress. As a major outcome, we helped the different industry sectors to find a consensus on technical requirements for the future EU road circulation legislation.

3 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 as they both represent the smaller companies in the sector and act as the main contact point for national authorities and national standardisation bodies. Their regular updates on national market trends, contributions to EGMF statistics and regulatory expertise are of great benefit to EGMF and all of its members.

In addition, EGMF is trying to expand its involvement in countries not yet represented in its membership.

4 International cooperation

In addition, EGMF maintains a close relationship with international partners, in particular in the US, in order to share expertise and knowledge.

EGMF is in regular contact with its US counterpart, namely the Outdoor Power Equipment Institute, in order to strengthen our preferential relationship. This helps our members to better understand the requirements and challenges posed by the respective European and US markets. In addition, EGMF and OPEI mutually participate in annual meetings. EGMF attended the OPEI annual meeting in Park City, Utah, in June 2019.

Furthermore, EGMF is involved in the International Internal Combustion Engines Manufacturers Association (IICEMA). EGMF exchanges information on existing and upcoming legal requirements related to engine emissions in different parts of the world, including Canada, China, Europe, India, Japan, Thailand and the US. EGMF is part of the Steering Committee and is involved in two working bodies. The 2019 IICEMA annual meeting will be hosted by CICEIA – the Chinese International Combustion Engine Industry Association.
Governance

1 Organisation

A • Governing bodies

The EGMF Board is elected by the General Assembly from representatives of full EGMF members. The Board drives the association’s strategy and supervises the management of the association.

EGMF Board 2019

- Wolfgang Simmer, President (Stihl Tirol)
- Eric Stegemyr, Vice-President (Husqvarna)
- Carlos Aragones (John Deere)
- Fiona Desmet (Honda)
- Alessandro Durante (Briggs & Stratton)
- Holger Lochmann (Stihl)
- Thomas Meyer (Etesia)
- Rasto Nichta (Toro)
- Franco Novello (Stiga)
- James Ramnought (Bosch Lawn & Garden)
- Alexander Schönfeld (MTD)

B • Working bodies

The work of the EGMF is done through two Committees and a number of task forces bringing together the knowledge and experience of more than 100 experts from both national associations and companies. The work is coordinated by the EGMF secretariat, which also manages the engagement with the EU institutions in Brussels.
1. Technical Committee

The Technical Committee includes eight task forces and one working group: they held more than 40 meetings between October 2018 and September 2019. Technical affairs constitute one of the two pillars of EGMF activities. Overseen by the Technical Committee, these task forces (TF) are shaping the association’s position on EU policies and regulatory developments.

These working bodies provide an effective forum for the exchange of information and discussion.

Fabio Ricci (FederUnacoma) has been chairman of the Technical Committee since July 2015 supported by a Vice-Chair: Maria Pawlowski (STIHL). Their four-year mandate was renewed in 2019.
2. Marketing Committee

The primary activity of the Marketing Committee is to run market surveys twice a year on the basis of inputs from all corporate members and to provide market analyses.

Covering 12 equipment categories and 39 countries, these bi-annual market surveys provide a well-established indicator for the garden and outdoor power equipment market in Europe.

In 2019, the Marketing Committee implemented a new online platform allowing members to upload their individual market data without any intermediary. This enables the automation of data collection, simplifies compliance with EU competition law, and increases security of data handling.

The Marketing Committee includes three task forces focusing on specific types of equipment:

- **Handheld Tools**: Linetrimmers / Brushcutters, Chainsaws, Garden Vacs, Hedgetrimmers and Split Shaft Multitools
- **Wheeled Tools**: Riding Lawn Equipment, Scarifiers, Shredders, Snowthrowers, Tillers and Walk-Behind Lawnmowers
- **Robotic Mowers**

Michael Leisentritt (Stihl) is the Chair of the Marketing Committee and is supported by Bjorn Snelders (Honda) as the Vice-Chair.
3. Secretariat

As well as the coordination of technical and marketing activities, the EGMF secretariat runs the daily management of the association and maintains the engagement with the EU institutions.

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

In addition, EGMF has welcomed a new Technical Desk Officer who assists the work of the Technical Committee and its task forces.
EGMF operates by fully respecting EU competition rules. EGMF members are bound by a Code of Conduct, which they must abide by at all times, notably during and around meetings.

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

**A. PROHIBITED TOPICS**

The following topics are prohibited and set 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, (extended) price adjustments, recommended prices, discounts, mark-ups and other price-related topics concerning products or services of members or companies;
- Divisions/sharing of the market, e.g. by allocating a specific geographical area, specific customers or specific groups of customers to specific members;
- Restrictions 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, 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;
- Representing 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 these 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 invoicing, on-charging specific costs) or if the use of the conditions is mandatory, the competition authorities may object;
- Restrictions as 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 organisations 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 statistical, 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 not containing 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 aims at compatibility of products and 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.
Regulatory and advocacy activities footprint.

1 Internal Market

A • Machinery Directive 2006/42/EC (MD)

The EGMF Task Force Machinery Directive (MD) has been focusing its activities primarily on the ongoing advocacy of the “Quick Start Guide” concept. In the context of the Machinery Directive evaluation, EGMF put forward a proposal to adapt the delivery of instructions to technical progress. We suggest giving a summarised version of the instructions, combined with the full instruction handbook provided by digital means.

EGMF was invited to present its proposal on digital instructions to the market surveillance authorities at their cooperation group (ADCO) meeting, and to the whole European Commission Machinery Working Group in February 2019.

In general, it is widely acknowledged that making instructions available by digital means is a positive forward-looking objective that should be explored during the revision of the MD. There are however challenges lying ahead to achieve consensus among all stakeholders and Member States who may still have deep concerns about the internet availability of users, the content of the minimum instructions, or the actual impact of digital instructions versus paper format for some machinery sectors.

EGMF then engaged in further discussion with the European Commission on this issue. As a follow up EGMF is drafting an in-depth paper to support digitalising instructions, taking into account the specificities of different machinery sectors.

In addition, in the context of the revision of the MD, EGMF provided its contribution to the European Commission inception impact assessment which proposed different policy options in view of the revision in February 2019. EGMF supported aligning the MD with the New Legislative Framework, converting the Directive into a Regulation, and explicitly permitting digital documentation.

Furthermore, EGMF contributed to the open public consultation on the MD revision and held an interview with the external consultant carrying out the impact assessment study in the summer of 2019.

B • Outdoor Noise Directive 2000/14/EC

The review of the Outdoor Noise Directive (2000/14/EC) has triggered numerous internal discussions and meetings of the Task Force Noise.

This remains a priority issue, since EGMF members are heavily impacted by this piece of legislation. Today, garden and outdoor power equipment represents more than a quarter of all the equipment falling under the OND scope. While some equipment is subject to labelling requirements only, other types must comply with noise emission limits.

First, EGMF carefully monitored the outcomes of the evaluation and impact assessment study, which was carried out by a consortium of consultants and to which EGMF actively contributed. We were happy to see that most of the EGMF positions were reflected in the study recommendations for the future legislation.

In addition, EGMF published concrete recommendations on how to shape the future Outdoor Noise Regulation. Notably, we provided relevant standards for our equipment portfolio to update current measurement methods, known as ‘test codes’, and evaluated the impacts on the measured noise value.

To strengthen our cooperation with European institutions, EGMF met representatives of the European Commission and participated in the official Noise Working Group meetings. We also work with Orgalim and other impacted mechanical sectors to build an industry coalition and to voice common recommendations throughout the review process.
In the coming months, EGMF will actively contribute to the preparation of the European Commission proposal for revised legislation that is expected in 2020. The review should address the non-adaptation to technical progress, reduce the administrative burdens, and enable self-certification of all types of equipment. However, the revision of noise limits should not result in any erosion of the equipment performance.

As well as the review, EGMF followed market surveillance related activities. An EGMF delegation notably participated in a workshop of the Noise and Machinery Directives Task Force (NOMAD).

C • Low Voltage Directive

Within the framework of the Low Voltage Directive (LVD) evaluation study, EGMF participated in a stakeholder workshop on 8 February 2019. EGMF argued in favour of the continued relevance of the LVD in ensuring the safety of electrical products, the clarity of the current scope, definitions, essential health and safety requirements, and the effectiveness of self-certification.

Moreover, EGMF took the opportunity of the ongoing discussions on digital documentation in other legislation to recommend making available the Declaration of Conformity and safety instructions by digital means, and not exclusively on paper under the LVD.

Prior to this workshop, the same messages had been put forward in the EGMF written contribution to the LVD evaluation survey.

D • Non-road mobile machinery (NRMM)

1. Exhaust emissions from NRMM – Directive 97/68/EC

EGMF, together with its partner industry associations, namely CECE, CEMA, FEM, EUROMOT, Europen and EUnited Municipal Equipment, developed and published in April 2019 a joint Guide to non-road mobile machinery (NRMM) and engines compliance with the exhaust emission requirements.

This Guide aims to assist market surveillance authorities in identifying compliant machines and engines installed in those machines with Stage V of Regulation (EU) 2016/1628, including transition engines and machines equipped with transition engines.

The document also includes further details about the required documentation and the obligations of the economic operators in the supply chain.

2. Road circulation

EGMF took over the secretariat and chairmanship of the Industry Task Force (ITF) on Road Circulation from September 2018 for one year. This cross-industry group consists of machinery sectors impacted by the future EU road circulation legislation.

The main ITF activity focused on finalising a technical document which lays down the requirements for self-propelled mobile machinery and towed machinery going on the road, which will be regulated in a future legislation. This document reflecting the industry consensus was submitted to the European Commission in March 2019.

In addition, EGMF – on behalf of ITF – met DG GROW representatives in May to keep the matter high on the European Commission’s agenda. The Commission reacted positively to the technical document and praised the ITF for the good work. Subsequently, the ITF group discussed the Commission’s questions and comments to ensure further clarity of the content and objectives of the technical document.

In parallel, the European Commission contracted an external consultant (PPMI) to carry out a new economic study providing a cost-benefit analysis of the major policy options to shape the future regulation on road circulation. In the framework of this study, EGMF and the ITF group participated in a stakeholder workshop which focused on reviewing the draft targeted questionnaire for equipment manufacturers. EGMF cooperated with the consultant to ensure that several interested EGMF member companies were interviewed and encouraged to respond to the survey.

E • Digitising the European Industry

As regards the digitalisation policy, EGMF mainly monitors regulatory developments at European level related to data, artificial intelligence and cybersecurity. EGMF has paid more and more attention to the digitalisation issue because of the increase in connected equipment in our sector and the impact of future technology developments. These issues are actively followed through Orgalim, and EGMF contributes to the advocacy work where appropriate. In the context of the final discussion on the Cybersecurity Act, EGMF co-signed a joint industry letter providing key messages to legislators for a successful European cybersecurity certification framework. In line with our main requests, the certification framework will remain of a voluntary nature and involve the industry for its implementation.
In addition, the issue of digitalisation is addressed through existing regulations. As an example, the Machinery Directive is currently assessed in the light of new technologies, including the integration of artificial intelligence in industrial equipment.

2 Market surveillance

The EGMF Task Force Market Surveillance closely monitored the final adoption of the new Regulation (EU) 2019/1020 on market surveillance and enforcement, which was published on 25 June 2019.

Rewarding the EGMF advocacy activities in the last few years, EGMF is pleased with the final provisions of the Regulation that will strengthen the market surveillance framework. In particular, EGMF welcomes the new requirement for all economic operators to be responsible for compliance information and the direct point of contact in the EU for the market surveillance authorities. We also welcome provisions promoting further cooperation between market surveillance authorities and organisations representing economic operators, such as industry associations, which will enable joint activities to promote compliance or identify non-compliance. A third positive outcome is the development of Union Product Compliance Network as a platform for structured coordination and cooperation between market surveillance authorities.

As a next step, EGMF will follow closely the implementation of the Regulation, as most of its provisions will be applicable as from 16 July 2021. However, the Union Product Compliance Network is intended to be operational by 1 January 2021, with the support of EU financing.

Another important action taken by the TF Market Surveillance is the collaboration with EPTA on dangerous accessories for angle grinders and chain-saws that have been subject to RAPEX notifications. EGMF and EPTA addressed two joint letters to the European Commission urging it to adopt a Decision requesting Member States to prohibit the placing on the market of these accessories, which carry high risks of serious and fatal injuries.

As an initial outcome, the European Commission brought the case of chain-saw disc and blade cutting accessories to the market surveillance group (ADCO) for machinery. In the meantime, the market surveillance authorities have decided to perform checks in the field, in order to identify other chain-saw discs which have not been subject to a RAPEX notification.

3 Environmental product policy: Ecodesign, Energy labelling and GPP

A • Ecodesign Directive 2009/125/EC

The EGMF Task Force Ecodesign & Environment continued to monitor the progress of the review of the ecodesign measures on electric motors and variable speed drives, lighting products and electronic displays.

We were glad to see that EGMF’s lobbying efforts were successful and that the relevant exclusions and policy gains were maintained throughout the policy process. As regards electric motors, EGMF secured exclusions for motors in hand-held and portable equipment. We also managed to minimise the information requirements to be displayed on either the manual or website and avoided at the latest stage the duplication of information requirements on recyclability.

Thanks to the cooperation with other industry associations representing the non-road mobile machinery in 2018, we were able to maintain the exclusion for lighting products installed in our machinery. For electronic displays, there have been positive results with status and control panels, very small displays, and those used in non-road mobile machinery for professional uses.

In addition, EGMF has worked on the preparatory study on potential ecodesign measures for high pressure cleaners. We have actively contributed and submitted technical comments to the European Commission Joint Research Centre (JRC) on different segments of the report. Furthermore, we have cooperated closely with EUnited Cleaning; we notably sent one joint position paper and letter. As a result, we have been successful so far in limiting the scope of the high-pressure cleaners covered. We will continue to closely monitor the study outcomes and any regulatory developments in the coming months.

B • Sustainability requirements for batteries

In 2018 the European Commission launched a study to assess the implementation of an ecodesign on batteries used in e-vehicles and domestic energy storage. As
the study has advanced, it appears likely that future measures will be implemented through a stand-alone regulation and will include measures to reduce the carbon footprint of batteries.

EGMF participated in two public consultations on the potential establishment of sustainability requirements on batteries, where we expressed our concerns on regulating an industry that is still developing. We are satisfied that batteries used for our equipment are not covered under the scope of the study, but will remain attentive as to how the legislative developments evolve.

C • Circular Economy

In order to promote the sustainability of our industries, EGMF and EPTA published a joint position paper outlining the different initiatives our industry takes to make garden machinery more circular and sustainable.

This joint paper was published on the occasion of the Circular Economy Stakeholder conference organised in March 2019, in which EGMF participated. Warmly welcomed by the European Commission, our contribution has also been published on the Circular Economy stakeholder platform.

The sustainability and circular economy issues will remain part of the EGMF actions and discussions in the next months since the transition to a climate-neutral economy ranks high on the future European Commission agenda. We will particularly monitor the ‘European Green Deal’, including a New Circular Economy Action Plan, which is expected in 2020.

D • Green Public Procurement (GPP)

Finally, the Task Force Ecodesign & Environment pursued its work on Green Public Procurement (GPP) criteria for public space maintenance.

The European Commission, together with its Joint Research Centre (JRC), is developing harmonised criteria at European level to encourage green requirements in public tenders. Although they are of a voluntary nature, these criteria will be used by authorities to select cleaning and gardening machinery and services to maintain public spaces such as parks and street vegetation.

Further to EGMF’s comments, the proposed criteria on noise emissions and machinery material, which went beyond legal requirements, were withdrawn. In addition, EGMF reiterated its aim to not distort market decisions among competing technologies. Although the core criteria remained aligned with the exhaust emission regulation, comprehensive criteria explicitly promote the use of electric equipment, notably battery technologies.

EGMF will follow the finalisation of these public procurement criteria, publication of which is expected in the next months.

4 Substances and waste

A • REACH Regulation 1907/2006 – Registration, Evaluation, Authorisation and Restriction of Chemicals

The EGMF Task Force Chemicals & Waste has continuously monitored the REACH implementation, particularly focusing on restriction and authorisation processes and ongoing initiatives to improve supply chain transparency.

Given the inclusion of lead metal in the Candidate List, EGMF has been cooperating with the International Lead Association to avoid the substance being included in the Authorisation List in the future. For this, EGMF has been contributing to a joint-industry advocacy campaign, and one type of garden machinery equipment type will be used as a case study on the importance of lead in the economy.

As regards the pending authorisation of chromium trioxide by the CTAC consortium, EGMF has been vigilant in respect of the ongoing developments. EGMF also addressed a letter to the European Commission in April to express our support for the authorisation and outline the negative impacts it would have for our industry if it were rejected. While the final decision is still pending due to ongoing political and legal discussions, EGMF continues to monitor the developments.

B • RoHS Directive 2011/65/EU – Restriction of Substances in Electric & Electronic Equipment

Several types of garden machinery have been impacted by the RoHS Directive for many years. In addition, since 22 July 2019 a substantial amount of combustion-engine powered equipment with an electric function must now comply with the RoHS requirements.

Dedicated efforts in the last years have recently paid off: the European Commission renewed a second series of exemptions for the maximum period. Building on this very successful experience, EGMF started to work on
the renewal of RoHS exemptions beyond 2021 through a cross-industry platform. This notably aims to continue using restricted substances for specific applications, such as the use of lead in steel, aluminium and copper alloys.

In parallel, the Chemicals and Waste Task Force closely monitored the review of methodologies to assess substances for possible restriction and request new or renewed exemptions. EGMF has also started to work on the general review of the RoHS directive, notably in providing inputs to consultation. We will continue contributing to the ongoing evaluation study and will closely follow the next steps of the review process.

C • Waste Policies

The Waste Framework Directive (2008/98/EC) was amended in 2018 by Directive (EU) 2018/851. This amendment introduced a new requirement for ECHA to develop a database containing the information about substances of very high concern present in articles, conforming to the communication requirements under the REACH Regulation. Therefore, EGMF actively participated in discussions on the development of such a database that should be in place by 2020.

In the different proposals ECHA has shared with stakeholders, the level of detail of information to be submitted to the database would result in an disproportionate administrative burden. EGMF participated in the first consultation in October 2018 to raise our concerns and shape the future database. In addition, EGMF closely cooperates with Orgalim on this issue. We notably channelled comments through Orgalim for the second consultation in June 2019, requesting an impact assessment and that the database does not exceed the scope of the legal text.

Furthermore, in June EGMF participated in a cross-industry workshop to open a dialogue on the different needs of chemical and article manufacturers and waste treatment operators. This was a positive exercise to increase transparency on the different positions across the value chain and was the first of more joint actions. In addition, EGMF cooperated with another six associations representing the non-road mobile machinery industry and sent a joint letter to the European Commission to highlight the specificities of our industries - further reiterating messages not to exceed the legal text and the need for an impact assessment to develop a proportionate tool.

In parallel, in the context of the revision of the Batteries Directive (2006/66/EC), EGMF met with the responsible Commission services to gain further insight into the process and identify the possible impacts for our sector. On this occasion, we expressed our concern over potential overlaps with the parallel study on sustainability requirements for batteries.
List of Members

Full Members
Status October 2019

National Associations

Associate Members