



ACTIVITY REPORT

2024

EGMF in a nutshell

The European Garden Machinery Industry Federation – EGMF – has been the voice of the garden machinery and outdoor power equipment industry in Europe since 1977. We represent 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.

To learn more and keep updated on all of our activities, visit our website, or follow us on LinkedIn and Twitter.

27

Full
Members

7

National
Associations

5

Associate
Members

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President's Message

As we acknowledge this year's successes and challenges, we stand at a pivotal moment for EGMF emerging as a strong, resilient and remarkable organisation in 2024. EGMF continues to have a solid network and membership, bolstered by the addition of three new members. We would like to give them a warm welcome as they join us in our mission to foster quality, innovation and sustainability.

EGMF has shown adaptability and resilience, despite the continuously challenging macroeconomic environmental and market developments as well as geopolitical uncertainties. Our industry faces the growing impact of climate change, with more frequent and challenging weather patterns. Yet, we continue to take a responsible stance by driving electrification in applicable segments, demonstrating our commitment to a sustainable future.

EGMF would not be what it is today without the relentless work that our Marketing Committee and Technical Committee are carrying out for EGMF members day by day. Within the

Marketing Committee, we have embarked on the modernisation of our statistics' platform for the exchange of EGMF market data, a project that promises to be of immense value. This platform will make our data easier to manage and enable us to respond more swiftly to market dynamics. It is a testament to our forward-thinking approach and dedication to innovation.

From the regulatory and technical standpoint, EGMF continues to actively engage with EU institutions in different policy areas, calling for a regulatory environment which puts in balance competitiveness and environmental protection. This statement, for which we have advocated for years, lies at the core of the EGMF Policy Manifesto that sets out the most important strategic priorities and demands for the next five years. As the new EU policymakers settle in office, establishing their own agenda, now is the time to increase our efforts in engaging with them. It is crucial that they understand the importance of our industry and the challenges we are facing but also the role we play in shaping a sustainable future.

We also have to acknowledge some significant internal changes. We warmly welcome our new Secretary General, Ioana Smarandache, bringing a fresh perspective and energy into the organisation. At the same time, we fully acknowledge the significant role that Olivier Janin (Orgalim Partnership Director) played in covering for the past Secretary General who was on medical leave. A

heartfelt thank you for his tireless support. We also welcome three new Board members this year and express our sincere thanks to their predecessors for their unwavering dedication to EGMF.

Lastly, the end of my mandate is drawing to a close. I am very honoured to have been able to bring my contribution as EGMF President and wish my successor the best of luck and success. I'm confident that, using our collective strength, innovation and commitment, we will navigate existing challenges and seize the opportunities ahead.

With gratitude,

Andreas Rangert

EGMF President

2022-2024



EGMF Footprint

EGMF is the strongest network representing the garden machinery and outdoor power equipment sector in Europe. We bring together:

32 **Companies**
(27 full members
and 5 associate members)

7 **National Associations**

Together, we go further

At EGMF, we fully believe in unity and cooperation. Sharing knowledge, experience, and connections is at the core of our strategy and are key elements of our success.

First, the seven **National Associations**, which are members of EGMF, are the voice of our industry at national level. Besides offering a national platform for both large and small companies in our sector, they are the main contact point for national authorities and standardisation bodies.

In addition, we join forces with other **European associations** on a regular basis. Building on very successful experiences in previous years, our close collaboration with fellow organisations in the non-road mobile machinery sector and the mechanical industry makes us stronger when facing regulatory challenges.


In past years, EGMF has also engaged in ad-hoc coalitions and wider industry platforms, such as the Umbrella Project on RoHS exemptions and the “BatteriesTransport” initiative.


At **international level**, we maintain a very close relationship with our US counterpart, namely OPEI – the Outdoor Power Equipment institute. Regular communication helps us to share expertise on our respective markets and better understand regulatory challenges our industry faces on both sides of the Atlantic.


EGMF is also involved in the International Internal Combustion Engines Manufacturers Association (IICEMA), which aims to exchange information on engine emissions in different parts of the world.


Garden machinery industry: EGMF market analysis


In 2023, now the third year in a row, we have noticed a continuous movement back to the pre-pandemic numbers of the European outdoor power equipment market. Last year, our 27 members sold 17.6 million units on the European Market (39 countries) compared to 20.6 million units in 2022. This can be attributed to several factors such as:


 The current conflicts in EMEA region, Russia and Ukraine, Israel / Gaza have had a negative impact on sales, which was compounded by political instability in major markets such as Germany, UK, Netherlands and France, and the EU elections.

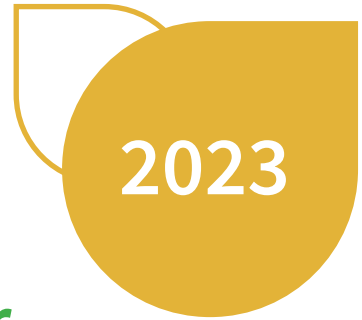
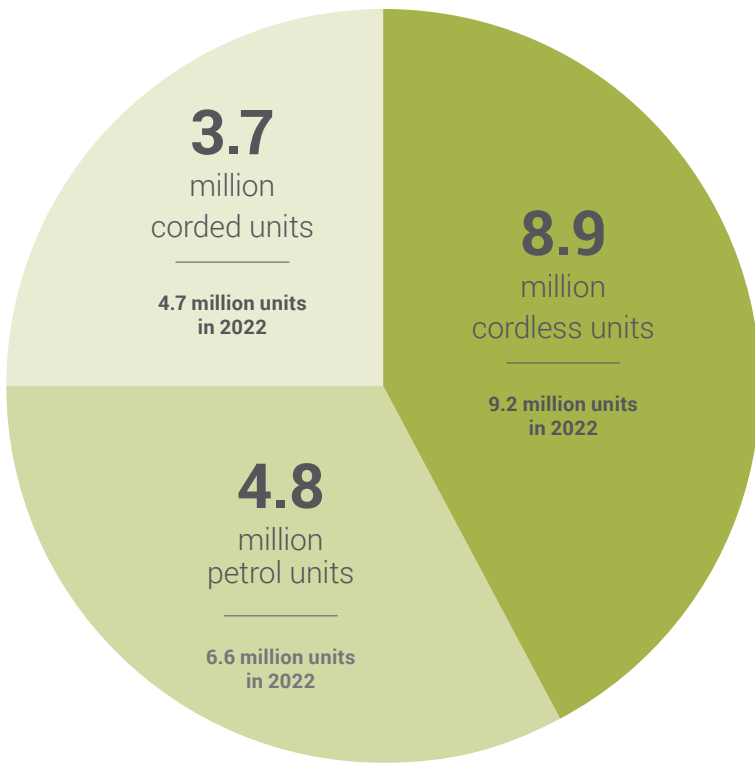
 The economic sentiment seems to have had a slightly positive recovery in the first quarter of 2023, yet sales are affected by high central bank interest rates in the European Union.

 Growing concerns from consumers regarding the cost of living (such as mortgage and energy costs). Additionally, according to latest research, there is a significant shift in consumer behaviour as more and more consumers are purchasing online in mass merchants and discount stores in general.

 Changing climate conditions where one can notice more extreme weather events. There is a rise in temperatures that can be witnessed in all countries. While central and southern Europe are experiencing hotter and dryer weather conditions, in Northern Europe there has been an increase in rainfall.

 Increased transport costs and longer transit times put pressure on margins. In combination with the mentioned economic sentiment and the stock situation in the pipeline (often higher than pre-pandemic), this makes the distribution channels quite reluctant to invest in stock.

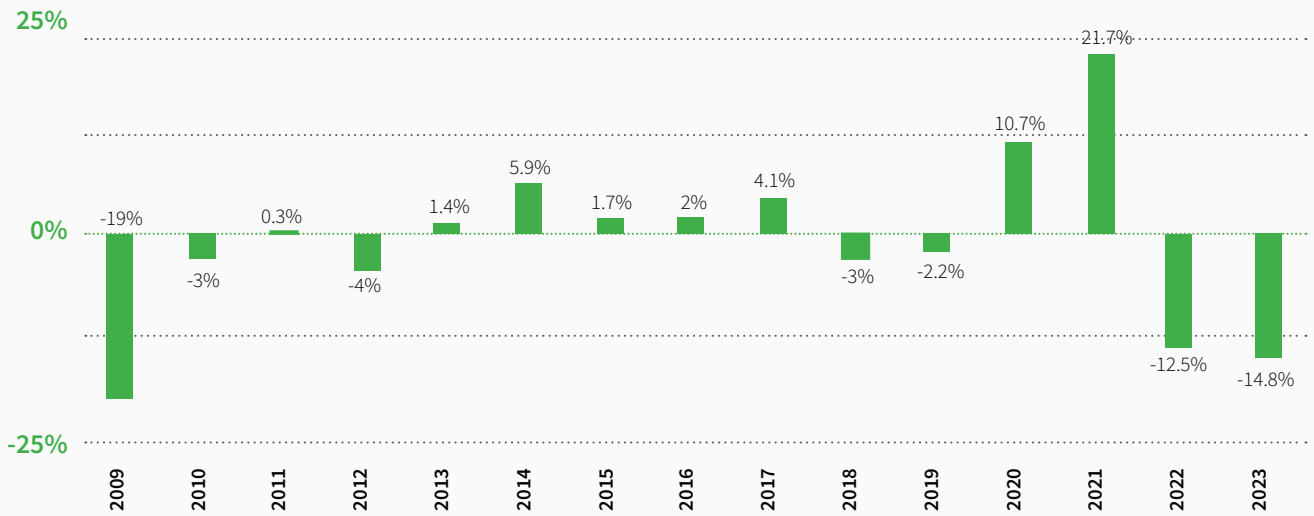
 As reported last year as well, these factors have not prevented a consistent evolution towards cordless - battery powered - equipment in 2024.



Year-by-year evolution

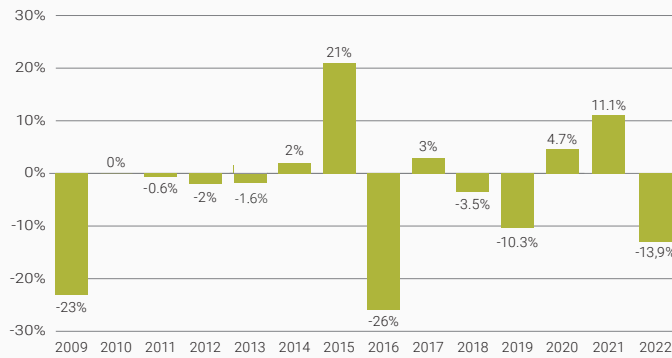
Total volumes

Change to p.y.



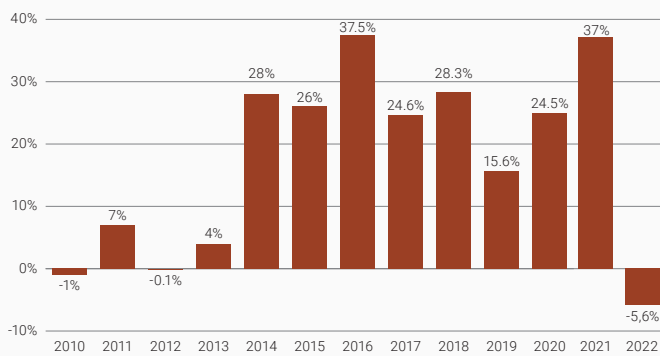
Volumes per type of power source

Petrol



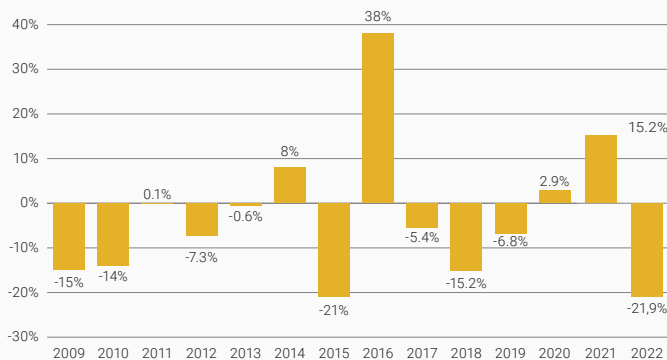
-26.8%
in 2023

Cordless



-3.1%
in 2023

Corded



-20.4%
in 2023

Governance

Governing bodies

The EGMF Board is elected by the General Assembly and is composed of representatives of our corporate members. The Board drives the association's strategy and supervises the management of the association.

Working bodies

The Technical and Marketing Committees are driving EGMF's work on technical, regulatory, and marketing matters. These two committees, and their several task forces, are bringing together the knowledge and experience of more than 150 experts from both national associations and companies.

EGMF Board 2023-2024



Andreas Rangert,
President (Husqvarna)



Thomas Meyer,
Vice-President (Etesia)



Anthony Nadalin,
(The Toro Company)



Luca Cappellazzo
(Stiga)



Paul Trowmann
(John Deere)



Wolfgang Simmer
(Stihl Tirol)



Marcel Berben
(Briggs & Stratton)



Rudolf Harrer (Honda)



Becky Cotsworth
(MTD / Stanley Black
& Decker)



Graeme Stockoe
(Bosch Lawn & Garden)



EGMF Team

The daily work of EGMF is coordinated by the Secretariat. Based in Brussels, the team manages the market surveys and engagement with the EU institutions, thus supporting outreach.



Ioana Smarandache
Secretary General



Federica Bottacin
Regulatory matters
(digital)



Dale Camsell
Technical Desk Officer



Lenna Morris
Communications



Silvia Alessi
Regulatory matters
(environment
& sustainability)



Giovanni D'Arezzo
Regulatory matters
(internal market)



Paulina Forys
Statistics



Emma Patralli
Administration

Our work

2024 has been marked by a lot of exciting developments, both within the secretariat and for the organisation itself. Yet all of the challenges we have faced have only made EGMF come out stronger and more resilient. EGMF has a renewed team with two new colleagues who joined the secretariat, in addition to the new Secretary General officially appointed in mid-April 2024. Similarly, our external branding has been completely revamped, which has contributed to a refreshed look and feel.

On top of this communication project, our regulatory and advocacy activities remain a core part of our day-to-day work in Brussels. We have successfully delivered on the garden machinery industry's priorities and messages, notably on the issue of digital documentation in the context of the new Machinery Regulation. The use of digital instructions ahead of the implementation of the Machinery Regulation has been officially allowed since spring this year, due to a targeted update of the Machinery Directive guidelines. This is due to EGMF's advocacy efforts and collective work with other industry stakeholder voices promoting the use of digital documentation.

Another big achievement that we can be proud of is the EGMF Policy Manifesto which was published in early June and widely disseminated to our institutional contacts. This document portrays priority messages and requests to the new EU

policymakers, defining our organisation's policy strategy for the next five years. The promotion of this manifesto and establishing a solid network with the new Members of the European Parliament and Commission officials, will continue to top our list of priorities for the months to come.

Last but not least, we have taken important steps to improve EGMF's compliance framework for the statistics' exchange having received legal guidance and support from EGMF's law firm. A new Code of Conduct which meets the requirements of EU's guidelines on compliance and anti-trust rules was adopted in June. The new compliance rules will be applied and integrated into EGMF statistics' platform for the upload of market data, which is currently being modernised. The aim is to create a more intuitive and user-friendly platform and connect it to an appealing visualisation tool that will embed the data from the platform. We are excited to see this project bearing fruit by spring next year.



Ioana Smarandache
Secretary General

Our work in numbers

35+

Internal meetings of the Technical and Marketing Committees, including task forces

2

Market surveys on 14 categories of equipment and 39 countries

16

Positions adopted, including letters, responses to consultations and joint statements with fellow organisations

4

Information Bulletins

3

Newsletters

EGMF market surveys

EGMF runs market surveys, twice a year, for several types of outdoor power equipment.

Our surveys cover 15 equipment categories and 39 countries. Based on input from all corporate members, these bi-annual market surveys provide a well-established indicator for the garden and outdoor power equipment market in Europe.

Our Marketing Committee, composed of representatives from companies and national associations, oversees the development of these surveys. This committee also keeps our statistical tools up-to-date, notably by adjusting the product segmentation to better capture market trends and increase granularity of the analysis.

In addition, we work on continuously improving our online statistical platform to facilitate the data collection process for members and improve the quality of survey outcomes.

The Marketing Committee also acts as a forum, offering a platform to discuss trends in the green area maintenance sector.

The Marketing Committee includes three task forces focusing on specific types of equipment: handheld tools, wheeled tools, and robotic mowers.

Task Force	Chair
Marketing Committee	Marcel Berben (B&S) Mark Earles (Makita)
TF Handheld Tools	Mark Earles (Makita) Sydney Lo (Bosch)
TF Wheeled Tools	Marcel Berben (Briggs & Stratton) Andrea Funaro (Stiga)
TF Robotic Mowers	Jakob Sauter (Stihl) Daniel Trumpp (AL-KO)

EGMF regulatory and advocacy activities

Regulatory and technical matters continue to be an essential part of EGMF's activities. On several priority policy files, our advocacy efforts have focused on ensuring EGMF's messages are carried throughout the regulatory processes, many of which have closed before the EU elections.

Regulatory and technical activities are driven by the Technical Committee, which is composed of technical experts from companies and national associations. The committee monitors EU regulatory developments impacting the garden machinery sector and defines policy priorities for EGMF.

As an overarching body, the Technical Committee coordinates the work of eight task forces and two working groups. These working bodies shape the association's position to speak as one voice.

Task Force	Chair
Technical Committee	Marcel Dutrieux (TTC) Paul Zwolinski (Makita)
TF Environment and Sustainability	Adolf Jürgen Neumann (Stihl)
WG CE used in NRMM	Luca de Rinaldis (FederUnacoma)
TF Market Surveillance	Henrik Larsson (Husqvarna)
TF Noise	Thomas Haag (Stihl)
TF Machinery	Arian Monem (Stihl)
WG Artificial Intelligence and Cybersecurity	Marcel Dutrieux (TTC)
TF Road Circulation	Lee Kristensen (Ransomes Jacobsen)
TF Battery	Stefan Schweiger (Stihl)
TF Chemicals and Waste	Bryce Hudelson (Bosch)
TF Electric and Radio Directives	Therese Berg (Husqvarna)



1. Internal market

The EU's Internal Market remains a core pillar in EGMF's regulatory work. EGMF completed its successful advocacy campaign on the Machinery Regulation at the end of 2022 and is currently focusing on the next phase of implementation.

We also stayed active on the revision of Annex III (measurement methods) of the Outdoor Noise Directive and will monitor the release of the new guidelines. On the road circulation Regulation of non-road mobile machinery EGMF is preparing to address the upcoming Delegated Acts.

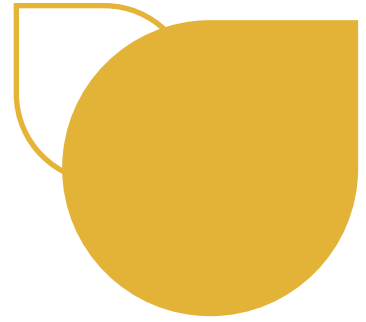
Machinery legislation

The EGMF Machinery Task Force has maintained its active engagement with the European Commission and other stakeholders as the focus shifts now towards the future implementation of [the Machinery Regulation](#).

During the Machinery Expert Group (MEG) meeting on 12 April 2024, the Commission announced the publication of an updated edition (2.3) of the Machinery Directive (MD) Guide. This new edition permits manufacturers to use digital documentation, including instructions for use and the declaration of conformity, before the full application of the Machinery Regulation on 20 January 2027. This change reflects ongoing efforts to modernise compliance processes and aligns with EGMF's longstanding advocacy for the inclusion of digital instructions in the Regulation, a significant victory secured during the trilogue negotiations.

The Machinery Task Force has also been addressing the formal objection raised by Germany against the EN 50434:2014 standard for shredders/chippers. EGMF, in collaboration with other industry bodies, has submitted technical arguments to the European Commission, advocating for a reconsideration of the objection. Although a decision has yet to be reached, the discussions have been constructive, and the matter is expected to be revisited at the next Machinery Expert Group meeting.

In parallel, the task force continues to focus on preparing for the content of the upcoming interpretation guidelines for the Machinery Regulation. Key areas of interest include the provision of essential safety information on paper



for non-professional machinery, as well as the requirements related to cybersecurity and seating, outlined in Annex III of the Regulation. The work on these guidelines is expected to begin in the autumn of 2024, with the European Commission planning to re-establish an Editorial Group, composed of experts from industry and Member States, to lead this initiative.

Looking ahead, EGMF is committed to closely cooperating with the European Commission to ensure that the future guidelines adequately address the specific needs of the garden machinery sector. This includes advocating for the appropriate balance between digital and paper documentation, ensuring that the transition to digital formats brings the intended economic and environmental benefits, while maintaining safety and compliance standards. The task force remains vigilant in monitoring developments and will continue to provide input to shape the final guidelines in the months leading up to the full implementation of the Machinery Regulation in January 2027.

Outdoor Noise Directive

Following the recent publication of [the revised Annex III of the Outdoor Noise Directive](#) (OND) in the Official Journal of the European Union, EGMF has remained actively engaged in the ongoing developments. The final text of the revised

Annex III incorporated several key provisions that EGMF had advocated for during the consultation process. These provisions include updates to noise measurement methods, the exclusion of uncertainty determination and the successful integration of EGMF's product-specific recommendations.

The EGMF Noise Task Force has also expressed strong support for the European Commission's proposed [Directive on rationalizing reporting requirements](#). This proposal, set to be adopted by the end of the year, includes the removal of Article 16 from the OND and aims to reduce unnecessary reporting obligations for manufacturers.

In this context, during the last Noise Expert Group meeting in July 2024, the Commission announced that a first draft of the guidelines on the OND will be released by the end of the summer. These revised guidelines will include updates related to the deletion of Article 16 as well as revisions to Annex III of the OND.

The EGMF Noise Task Force will continue to closely monitor the implementation of these new provisions and other ongoing developments.

Road circulation

Throughout the past year, the EGMF Road Circulation Task Force work has been actively participating in the discussion on the proposal for a Regulation on the road circulation of non-road mobile machinery. During the interinstitutional negotiations, the task force analysed the Council's position and reacted to amendments proposed by the IMCO Committee, which was communicated to policymakers before the IMCO vote.

Following the European Parliament's approval on 24 April 2024 and the Council's endorsement, the [final text](#) of the Regulation is due for publication in the EU Official Journal. EGMF is also preparing for the European Commission's forthcoming Delegated Acts, expected 24 months after the regulation's entry into force.

In parallel, EGMF was addressing a pressing concern regarding the regulation of battery-powered non-road mobile machinery. The absence of a harmonised EU-wide regulation led to one Member State implementing its own specific and unsuitable requirements for public road approval. This situation poses significant challenges for EGMF products. In response, ongoing discussions within EGMF sought to determine whether the association should adopt a formal stance on this issue. EGMF continues to closely monitor developments in this area, representing its members' interests amid this evolving regulatory landscape.

Radio Equipment Directive

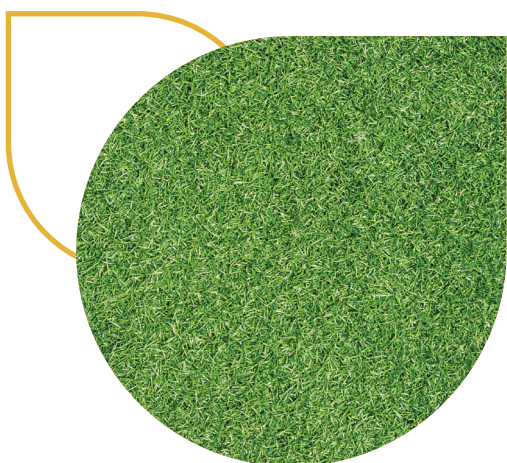
In October 2023 the European Commission published the [Delegated Regulation \(EU\) 2023/2444](#), amending Delegated Regulation (EU) 2022/30 concerning cybersecurity aspects related to radio equipment. This amendment essential extends the application date for the essential requirements by 12 months, shifting the effective date from 2024 to 1 August 2025. This extension, advocated by various industry stakeholders, including EGMF, allows manufacturers and stakeholders additional time to comply with the new regulations.

To ensure that these changes are correctly interpreted by the manufacturers, an expert group has been established to work on the revision of the Radio Equipment Directive (RED) guide. Under the coordination of the Administrative Cooperation Group (AdCo) on RED, EGMF is actively contributing to this revision.

During the first meetings, the discussions focused on editorial updates, including references to the Blue Guide, and other necessary clarifications. A key topic was the use of harmonised standards with restrictions, where it was agreed that manufacturers should assess whether these restrictions impact their products or not, potentially reducing the need for consultation with a Notified Body.

Currently, the EGMF Electric and Radio (ERD) Task Force is proposing changes to the draft revised RED Guide. The EGMF representatives participating in the ADCO RED expert group, will ensure the new guide will reflect the latest developments and the specific needs of garden machinery manufacturers. Moreover, EGMF supports the [Commission's proposal for a Directive on rationalising certain reporting requirements](#) across various directives, including those related to radio equipment. This initiative seeks to cut reporting obligations by 25%.

EGMF has been involved in discussions, particularly concerning the amendment of Article 47(1) of the RED, which currently requires Member States to report to the Commission every two years. The proposed amendment, aligned with EGMF's advocacy for reducing administrative burdens, seeks to extend the reporting frequency to every five years, in line with the Commission's reporting to the European Parliament and the Council.



2. Digitalisation

EGMF, through its Artificial Intelligence and Cybersecurity Working Group (AI and CS WG), over the past years focused its digital activities on the Cyber Resilience Act (CRA), the Artificial Intelligence Act (AIA) and the Data Act.

Given the significant impact of CRA on EGMF industries, our association co-signed on 7 November 2023 the position paper titled “Cyber Resilience Act: Europe’s technology industries ask decision-makers to proceed with care and caution”, together with Orgalim and fellow associations. This paper identified priority issues to be addressed during the trilogue meetings, including the implementation timetable and the classification of products falling under and outside the scope of the Regulation. The working group held two meetings in March 2024 to discuss and identify whether EGMF products are included in the list of important products with digital elements or in the list of critical products with digital elements, both annexed to the CRA. Classification is extremely important because products with digital elements will have to undergo more rigorous conformity assessments depending on how they are classified.

The CRA has not been published in the EU Official Journal yet, but its publication is expected in the upcoming months. EGMF will continue monitoring

the developments on this file, as well as those on the Radio Equipment Directive (RED) Harmonised Standards, in collaboration with the EGMF relevant taskforce. Once published, the RED Harmonised Standards will serve as foundation for future CRA standardisation.

The working group also covered the Artificial Intelligence Act, which was published in the EU Official Journal on 12 July. To discuss issues related to the implementation of AIA, EGMF nominated two representatives in the ad hoc Orgalim AI subgroup. This subgroup is currently drafting a position paper related to the implementation of the AIA and its interplay with RED, which will be submitted to the European Commission by the end of September, asking to avoid unjustifiably broad interpretations of the AIA.

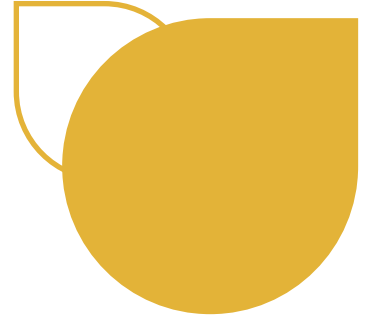
Classification plays a key role for the AIA as well, since the AIA divides the AI systems into distinct categories of risk, including the high-risk category. EGMF will continue to discuss this matter both internally and in the Orgalim AI subgroup to identify whether EGMF AI systems belong to the high-risk category and are subject to the related obligations. Lastly, since the Data Act entered into force in January 2024, EGMF decided to nominate two experts to represent the organisation in an ad hoc Orgalim sub-group drafting a guidance document on the implementation of the Data Act.

3. Sustainability

As representatives of an industry that is close to nature, EGMF members have always been in the forefront of environment-friendly technology. Manufacturers strive to develop innovative solutions that successfully maintain green areas in a way that minimises climate and environmental impact and complies with the targets of the European Green Deal.

With the new European Commission's political guidelines unveiled after the European elections, the current legislative cycle is set to focus on the implementation of flagship legislation on the green transition. EGMF welcomes this challenge and commits to making the utmost effort to ensure that products respect unprecedentedly high levels of safety, circularity, and climate-neutrality, from design phase to end-of-life.

At the same time, EGMF will continue advocating for a policy approach which supports the single market and reinforces competitiveness across the EU, making sure industries can rely on a harmonised framework for sustainability reporting.



Batteries and Waste Batteries Regulation

The new Batteries and Waste Batteries Regulation has always been the key priority for the Battery Task Force. Following the entry into force and the application of the law in February 2024, the task force has been focusing on the implementation of its most impactful provisions.

EGMF has been active in the preparatory work for the upcoming Delegated and Implementing Acts. More specifically, EGMF and EPTA joined forces to provide feedback to two consultations: one on the future Implementing Regulation on labelling requirements and another on the battery diligence schemes and implementation guidelines. In the latter case, EGMF set up a targeted working group, jointly with EPTA, with the purpose of monitoring the consultation process on battery due diligence requirements and drafting a common response. This group is expected to be kept active until the first quarter of 2025.

Additionally, from the very beginning, EGMF has been monitoring the preliminary work on the carbon footprint calculation and verification rules for industrial batteries, which is being conducted by the Joint Research Centre. A draft Delegated Regulation is soon to be published for feedback. Over the course of next year, EGMF will also continue following the preparation of secondary legislation on performance and durability requirements and

the digital battery passport, including in terms of standardisation developments.

Packaging and Packaging Waste Regulation

The Packaging and Packaging Waste Regulation (PPWR) proposal sets out plenty of targets across a variety of issues, ranging from packaging reduction targets and reuse targets to the harmonisation of environmental labelling rules and Extended Producer Responsibility schemes.

EGMF has been leading the advocacy on this file throughout its full legislative process, with a total of ten single and joint industry statements from March 2023 to September 2024. Additionally, EGMF has been acting to make sure the final version of the PPWR abstains from imposing unrealistic targets and administrative burdens. In October, EGMF single-handedly proposed its voting recommendations for the Plenary session, resulting in a victory with regards to EU-wide harmonised labels and packaging minimisation.

EGMF also co-signed the “Joint industry statement on harmonisation of packaging labelling in the European Union”, expressing concerns over provisions that allow Member States to introduce national labelling systems for extended producer responsibility schemes. In addition to this, EGMF joined other 106 organisations in the signature of



the recommendation letter “EU packaging rules that work: Making the Single Market and sustainability go hand in hand”, which called Member States to avoid the fragmentation of information and labelling requirements and restrictions in their General Approach.

The Environment and Sustainability Task Force, which takes the lead on this file, will continue monitoring any progress concerning the implementation of the provisions on reusability and recyclability, especially as far as exemptions are concerned.

Ecodesign for Sustainable Products Regulation and product specific Ecodesign revisions

The Regulation establishing a framework for the setting of ecodesign requirements for sustainable products – Ecodesign Regulation in short – entered into force in July 2024 and will become applicable two years thereafter. As a piece of legislation of high direct impact on EGMF members, our current priority is monitoring the next steps on implementation.

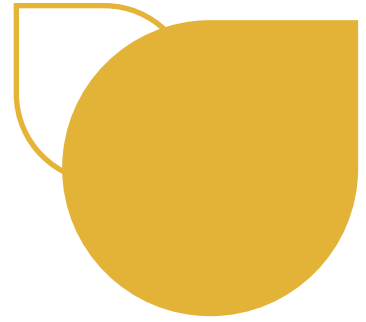
In line with the product-by-product regulatory approach, the European Commission is currently involved in the first working plan that will define the ecodesign performance criteria applicable

to iron, steel, aluminium, and textiles. EGMF simultaneously follows two more topics in the scope of the Ecodesign framework: the implementation of the Digital Product Passport and the energy labelling regulations on external power supplies and industrial fans.

Amongst a multitude of different topics, the Ecodesign Regulation also provides reporting obligations regarding the tracking of substances of concern in products. During the trilogue negotiations, EGMF co-signed a letter of recommendations with European Heating Industry, Lighting Europe, and Japan Business Council in Europe. The letter asks institutions to clarify and simplify the scope of the substances subject to reporting as well as the responsibilities of the actors along the supply chain. The final text is a satisfactory result for EGMF: while the terminology “substance of concern” was kept, the scope and information requirements were amended to be aligned with REACH Regulation and a supplier obligation to provide all relevant information was not included.

Common Rules Promoting the Repair of Goods Directive

EGMF has been closely monitoring the Directive proposal on common rules promoting the repair of goods, shortened in “Right to repair”, which came into force in July 2024.



EGMF provided comments on the initiative throughout the whole legislative process, concluding with a letter co-signed with EPTA which provides industry recommendations for the trilogue negotiations.

All in all, EGMF collected positive outcomes with regards to the “obligation to repair” scope, which includes the products individually regulated by the Ecodesign framework, the repair duration, the optional loans, and the provisions on spare parts.

Life cycle assessment

“Scope 3” indirect emissions from the value chain, as defined by the GHG Protocol, account for the majority of a product’s GHG emissions, especially in the use of sold products. By 2026, companies are required to report in-house GHG emissions in accordance with the Corporate Sustainability Reporting Directive.

To ensure compliance with this framework, in late May, the Environment and Sustainability Task Force established a sub working group to examine and identify an industry standard for the calculation of emissions stemming from product use phase. The subgroup will strive to conduct a mapping of international and European standards, and, if necessary, produce a new one which is applicable to all EGMF products.

This project, open to any EGMF member who is keen to volunteer, will keep the group busy until at least next year.

REACH Regulation

EGMF has been actively following the developments of ECHA’s restriction proposal on the use, production, and marketing of Per- and polyfluoroalkyl substances (PFAS), after submitting its response to the consultation in September 2023. Over the past year, ECHA has been discussing the restriction proposal in its Plenary meetings, on the basis of a sector-by-sector approach previously announced.

ECHA and the five countries that submitted the restriction report are negotiating key aspects concerning the scope, hazards, and general approach. Also, an update to the original restriction dossier is reportedly underway. At this stage of the process, the priority for the Chemicals and Waste Task Force is to keep members up to date on all developments on the potential restrictions and derogations on the applications that impact on the garden machinery industry.

From a broader perspective, the European Commission is also expected to come up with a review of the REACH Regulation, which is foreseen to be published in the Commission’s

work programme for 2025. EGMF is aware of the Commission's initiatives which may anticipate the future amendments to the REACH framework, namely the communication on limiting the most harmful chemicals to essential use, as well as the preparatory work on strengthening the role of substitution planning in EU chemical legislation.

RoHS Directive

In December 2023, the European Commission published three legislative proposals under the "One Substance, One Assessment" package, aimed at simplifying and streamlining regulatory processes, including by reforming the roles of the EU agencies.

EGMF had its say regarding the proposal for a Directive on the re-attribution of scientific and technical tasks to ECHA. This is a targeted amendment to the Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS). The purpose is to change the legal basis for the exemptions-related procedures to the framework of the REACH Regulation and to assign to ECHA the responsibility for managing exemptions. In February 2024, EGMF co-signed the joint feedback to the Commission's consultation drafted by the RoHS Umbrella Industry Project, which EGMF is a member of. The statement calls for more active involvement of stakeholders

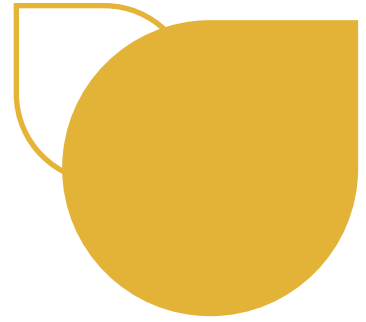
during the consultation processes on exemption applications as well as on the procedure for review and amendment of the list of restricted substances.

The legislative process of the initiatives under this package is going to resume with the new European Parliament setup. These files, together with the renewal applications for certain exemptions under the RoHS framework, represent a key issue of interest to the Chemicals and Waste Task Force.

Persistent Organic Pollutants Regulation

The Chemicals and Waste Task Force has on its radar the relevant EU chemical legislation beyond REACH Regulation and RoHS Directive. In 2024, EGMF took advocacy actions with regards to the Persistent Organic Pollutants Regulation (POPs), which implements the international Stockholm Convention on persistent organic pollutants and sets out restrictions on manufacturing, placing on the market, and use of certain substances.

EGMF submitted its position paper on the draft Delegated Regulation and its Annex on the inclusion of UV-328 – a UV radiation absorber mainly used for plastics – as a substance subject to marketing restrictions. The statement calls for the inclusion of derogations on spare parts for the garden machinery industry on the derogations list in the draft Annex. The Commission's adoption of the Delegated Regulation is foreseen for the end of 2024.



Standardisation policy

In line with the EU's efforts to refine its standardisation framework, the European Commission launched a [public consultation on the evaluation of Standardisation Regulation 1025/2012](#).

This evaluation aims to assess the effectiveness and adaptability of the Regulation in the rapidly changing technical standardisation landscape and to ensure it continues to support the EU's broader strategic goals.

The consultation, which ran until 25 July 2024, provided a significant opportunity for stakeholders to influence the future direction of European standardisation policy. EGMF provided feedback to this consultation, requesting that the standardisation framework should remain inclusive, market-driven, and aligned with industry needs.

Additionally, the consortium partners assisting the European Commission in evaluating Regulation 1025/2012 launched a targeted survey for industry associations and companies to gather specific stakeholder feedback. EGMF formulated a response to this survey, reinforcing its commitment to shaping future European standardisation developments.

To reaffirm its pivotal role in this area, EGMF, through Orgalim, contributed to defining the actions for the 2025 Annual Union Work Programme for

European Standardisation (AUWP). Members of the High-Level Forum on European Standardisation have the opportunity to shape key priorities for the future. EGMF emphasised two critical areas:

-  Cybersecurity requirements for products with digital elements: The goal is to ensure that hardware and software products are developed with fewer vulnerabilities, and that manufacturers prioritise security throughout the product life cycle.
-  Revision of the standardisation request in support of Union policy on artificial intelligence: This aims to ensure AI systems are safe, trustworthy, monitored throughout their life cycle, respect fundamental values and human rights, and bolster European competitiveness.

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