



EGMF concrete proposals to reduce EU regulatory burden

EGMF Position Paper

The European Garden Machinery Federation (EGMF) represents large and small manufacturers of garden, landscaping, forestry, and lawn maintenance equipment.

Through its 42 member bodies – 7 national associations, 30 full member companies and 5 associate members – EGMF represents about 20,6 million cordless and corded units placed on the European market every year, accounting for around 80% of garden machinery. Moreover, EGMF members employ over 120,000 people in the EU. In recent years, we have witnessed a “regulatory tsunami” that has significantly increased operational costs, complexity across supply chains, and legislative burdens on companies. This scenario is exacerbated by the rise of diverging national initiatives and protectionist sentiments that undermine European unity and market integrity, leading to fragmentation at EU level, stifled innovation, and a loss of competitiveness.

The key issues and recommendations that we believe are crucial to secure a supportive framework for a competitive, innovative and sustainable European Garden machinery industry, are outlined in our [EGMF’s manifesto for the 2024-2029 EU legislative term](#).

EGMF welcomes the EU’s new political commitment to reducing regulatory burden. However, EU institutions must ensure that this reduction encompasses regulatory burden in general and does not address only reporting requirements, whose reduction would be insufficient to tackle the larger issue of regulatory burden.

With this paper EGMF aims to present three concrete examples regarding current and upcoming burdensome legislation impacting European garden machinery.

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1. Inconsistencies of AI rules with other legislation

Regulatory inconsistencies and overlaps with other existing legislation (Machinery Regulation and Radio Equipment Directive, for example) could lead to different interpretations regarding the definitions of AI systems or could widen the scope of providers of such systems. For instance, the Commission's current inconsistent interpretation of the Radio Equipment Directive (RED) and Artificial Intelligence Act (AIA) suggests that any product under the RED Delegated Act incorporating AI-based cybersecurity components might automatically be classified as high-risk.

Incoherent interpretations between different pieces of legislation such as the ones above lead to additional administrative and compliance costs for companies and may hinder or hold back the market uptake of AI technologies. Ensuring legal assessment to analyse the scope of AI-based safety components would help clarify which regulatory requirements are relevant or not, allowing manufacturers to avoid spending unnecessary resources on compliance with regulations that do not apply to their products.

2. Delays in standards development and harmonisation

The average time to develop a harmonised standard (hEN) has recently improved from 10 years to 6. However, there are still difficulties in terms of meeting the deadlines put forward in relation to the application dates set out in EU legislation. Having insufficient time to develop standards, due to challenging application date deadlines, is harming industries by creating unrealistic timelines. Moreover, the standardisation system is predominantly funded by industry, and delays in standards' citation generate increased costs for businesses. This implies that, even if the standards are published on time, businesses will have insufficient time to develop compliant products. Shortened timelines can ultimately carry the risk of product incompatibility and even non-compliance (E.g. *European Commission implementing decision on standardisation request in support of Machinery Regulation (EU) 2023/1230*).

When determining the application date for new legislation, the time needed for standards' development should be considered. This implies speeding up and simplifying the process for updating harmonised standards. For new hENs covering innovation or adding provisions for new pieces of legislation, a transition period should be sufficiently flexible to

ensure a smooth transition and avoid that unrealistic deadlines potentially lead to non-compliance.

3. Unnecessary administrative burden for Declarations of Conformity (DoCs), CE marking and instruction manuals

The Blue Guide allows manufacturers to have a single DoC dossier for products covered by multiple regulations, but fragmentation still exists since some regulations require physical DoCs while others allow digital versions. This is valid for instruction manuals as well. On the CE marking, the Radio Equipment Directive (RED) mandates CE-marking on packaging, whereas no other legislation requires it on packaging. The lack of alignment across regulations creates uncertainty and additional work and costs for manufacturers.

EGMF is a strong advocate of the alignment of EU product legislation with the New Legislative Framework (NLF), to limit divergent interpretations and ensure a uniform application among member states, and notably to permit the digital format of DoCs and instructions, across the board. This could lead to significant savings, for instance approximately 16.6 billion EUR per year in printing costs from digital instructions, as estimated in the Machinery Directive guideline (version 2.3).

Conclusion

All in all, EGMF highlights the significant challenges posed by the current regulatory landscape, which has led to increased operational costs, complexity across supply chains, and legislative burdens for companies. EGMF emphasizes the need for a supportive framework that fosters competitiveness, innovation, and sustainability within the European garden machinery industry. By addressing inconsistencies in different legislation, speeding up standards development while setting realistic application deadlines, and achieving further harmonisation on product documentation (through alignment with the NLF), EGMF believes that regulatory burdens can be significantly minimised, which ultimately benefits both manufacturers and consumers.