



European Federation of Materials Handling

POSITION PAPER

RE: FEM reply to the envisaged extension of the flexibility scheme for adapting the combustion engines of non-road mobile machinery to new emission levels according to Directive 97/68/EC.

The *Fédération Européenne de la Manutention* (FEM) is the organisation of the European manufacturers of materials handling equipment. Besides other products our members produce mobile cranes, industrial trucks and elevating equipment. These products are usually powered by diesel engines or by diesel-hydraulic drives. As such they are affected by the new diesel emission limits coming into force.

The members of the national associations forming FEM are mainly small and medium enterprises which typically deliver their products over a wide range of different machines. Customers expect machines with high specific performance which often presents an obstacle to modularity whilst at the same time the affordable dimensions and the affordable weight are limited. Thus the power train systems very often differ significantly from type to type (i.e. little to none families over the entire product range).

This causes a situation which already places a big economic burden on our industry, which causes major investment in time and money (R&D costs and compliance costs) to meet the legal requirements. Especially with the difficult and unpredictable economic environment today there is a further enormous risk for the manufacturers as the changes to newer engines need a planning which easily might be proven wrong due to the still declining orders with unknown outcome in the future.

Thus we really appreciate the move to extend the flexibility scheme as this would allow the manufacturers to react much more flexible in a volatile environment.

We hope to have clarified on this issue, but of course further detailed explanation can be given if required.

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