



# Modification of the Noise Directive

**2000/14/EC**

**FEM position**



## FEM products affected by the Directive

- 1 Aerial access platform with combustion engine
- 12 Construction winches
- 14 Conveyor belts
- 36 Lift trucks
- 38 Mobile cranes
- 53 Tower cranes

### Among the new equipment proposed

- 107 Bridge/gantry cranes (harbour/portal cranes)
- 117 Staddle carrier
- 118 Reach stacker



## FEM general comments on the Directive

- **What is the purpose of the Directive:** shall test codes reflect peak values or the average noise level of a work cycle?
- **Limit values:**
  - The Directive should be a challenge for the worst equipment not for the average
  - FEM supports the principle of the Noise WG that limit values should be achievable using the technology available (development and not research)



### Data collection

- Clarification is needed between the declaration of conformity which accompanies each machine and generally also refers to other directives and the necessary data for the data collection
- Collection of data should be done only once to limit the burden on the industry.
- It should be done preferably through the IT tool which has been developed.



## New Legislative Framework – Decision 768-2008

### Certification module

- The Directive requires that the manufacturer declares a guaranteed value and affixes it on each piece of equipment. This value becomes the limit value for a particular equipment which needs to be below the regulatory limit set up by the Directive for some families of machines.
- The market surveillance has to check that the guaranteed value is not exceeded
- As a consequence, all families of equipment should have the same certification module. **FEM proposes to adopt module A** as adopted in the Machinery Directive for most machines.



## New Legislative Framework – Decision 768-2008

### First draft modified Directive presented during the noise expert group meeting on 16 July

- The introduction of the New Legislative Framework is welcome.
- It should not be a simple copy of the Decision
- Chapter I art 3: a reference to the decision is enough for the definitions needed for the purpose of this Directive
- Chapter II: It appears that there are some parts of the text which need to be adapted or are not appropriate to this Directive. For example Point 2 marking, point 4 second indent , point 7
- Chapter III, article 14: the reference to the standards is not enough as there are test codes which will stay in the Directive



## New Legislative Framework – Decision 768-2008

### First draft modified directive presented during the noise expert group 16 July (ctd)

- Chapter III, article 16: The requirement of the Directive is not only in art 11 and 12; the DoC cannot be continuously updated as it is given with the equipment
- Chapter III, Article 17: needs to be clarified as the marking includes CE plus the guaranteed value with a dedicated sign.
- Chapter V: This chapter could be simplified. Art 22 and 23 should not be here as it is general and not linked to assessment bodies
- Chapter VII: we do not understand Art 42
- There is no date of application



## Reference to Harmonised standards

FEM welcomes the proposal to use harmonised standards but needs more time to comment in detail.

Some questions need to be solved

- What is the meaning of “presumption of conformity” to standards which are test codes?
- How to avoid safeguard clauses
- How far can the test codes be modified by standardisation (adoption of standards based on consensus)? + problem with the first try for a mandate.
- ...



## Working group on outdoor equipment noise, Position paper 2009-07-10

### 1 Aerial access platform with combustion engine

- Ref to detailed position

### 12 Construction winches

- FEM could accept to have both ICE and EM winches in Article 13

### 14 Conveyor belts

- No information

### 36 Lift trucks

- Ref to detailed position

### 38 Mobile cranes

- FEM agrees with the recommendation



## Working group on outdoor equipment noise, Position paper 2009-07-10 (ctd)

### 53 Tower cranes

- FEM agrees with the recommendation

### Among the new equipment proposed

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# FEM Industrial trucks

## 36a Lift Trucks, Vertical mast, Rough terrain

## 36b Lift Trucks, variable reach, Rough terrain

With amendment 2005/88/EC of directive 2000/14/EC stage I limit values were extended due to the finding that limit values according to stage II were not technically possible.

Even with the efforts put in by the manufacturers of engines and lift trucks, the limit values of stage II are not achievable with existing technology today.

The future requirements of the accompanying legislation of **directive 97/68/EC** will lead to greater cooling requirements **generating more noise** due to the **increased air flow across cooling packs** (approx. 30% more cooling power on stage IIIB engines). No information is available for stage IV engines.

The change of the test code as per WG7 position paper 7/2004 is welcomed by industry. The difference between the 2 test codes can be evaluated to about 1 dB.

FEM is in favor of

- Keeping stage I limit values since due to concurrent legislation it will be a challenge to achieve even stage I limits with stage IV engines.
- Adapting the test code as mentioned above



### FEM Industrial trucks

#### 36a Lift trucks, Vertical mast, Other counterbalanced CE > 10t

With amendment 2005/88/EC of directive 2000/14/EC stage I limit values were extended due to the finding that limit values according to stage II were not technically possible.

Even with the efforts put in by the manufacturers of engines and lift trucks, the limit values of stage II are not achievable with existing technology today.

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FEM is in favor of

- Keeping stage I limit values since due to concurrent legislation it will be a challenge to achieve even stage I limits with stage IV engines.
- No modification of the test code.



## FEM Industrial trucks

### 36c Lift trucks, other counterbalanced CE<=10 t

FEM supports the recommendation given in the noise working group position paper 2009-07-10

#### Justification

**A lift truck <10 t cannot be used in urban areas for the following reasons:**

- Need prepared smooth ground
- No approval for driving on public roads
- No application in urban areas (for construction sites RTT are needed)



# FEM Industrial trucks

## Lift trucks used in agricultural environment:

FEM is in favour of excluding those lift trucks as the other agricultural machines

Justification:

- They present a particular fire hazard with enclosed engines necessary to meet the limit noise values due to collection of flammable materials (such as straw, cereal products, animal feed etc.) drawn into the engine enclosure by the cooling fan.
- For fire safety, these engine enclosures need to be designed to allow debris to drop through. The open bottom design prevents an effective noise suppression system from being incorporated. With increased flow required through cooling systems, to meet revised exhaust emissions, the greater will be the amount of debris drawn in. Also, greater will be cooling fan noise increasing the requirement for more noise suppression.