



European Materials Handling Federation

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## **FEM comments on EC inception impact assessment – road circulation requirements for mobile machinery**

FEM (the European association Materials Handling, Lifting and Storage Equipment) fully supports the European Commission's initiative to harmonise road circulation requirements for mobile machinery. One key objective that this legislation should pursue is guaranteeing a high level of on-road safety.

### **Preferred option and key principles**

FEM would like to argue that mobile machinery meeting this EU legislation must not be subject to multiple approvals and divergent national technical requirements for road circulation of mobile machinery. Our manufacturers prefer a regulatory approach which combines self-testing for most road circulation aspects with no need for accreditation (already covered by the Machinery Directive), while third party testing should be required only for safety critical aspects directly relating to road use (i.e. steering and braking). National vehicle registration would remain, in our view, under Member States' competence.

### **Scope and conformity assessment**

- In terms of conformity assessment, the procedures to be put in place and the administrative and testing required should not generate unnecessary costs for manufacturers and many low-volume highly specialised machines.
- Where possible, this legislation should include small volume/series to allow low-volume manufacturers and SMEs to reap the economic benefits while safety levels are maintained. A simplified alternative process for low volume (<250 or <500 per annum) should be included in this upcoming regulation.
- The conformity procedures should include the use of trailers and towing.

### **Consistency with the Machinery Directive and other legislation**

Mobile machinery during operation and use should still be required to comply with the MD and therefore, there should be no conflict or overlap between the Machinery Directive requirements and road circulation aspects covered by this new legislation. Safety aspects not related to road use should remain under the Machinery Directive.

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