



Comments on the draft Ecodesign regulation on lighting products

Brussels, 7 June 2018

FEM, CECE, CEMA and EGMF are the European federations representing manufacturers of materials handling, construction, agricultural and garden machinery. We would like to provide our views on the draft Ecodesign Regulation on light sources and separate control gears to achieve a balanced regulatory framework.

Several types of FEM, CECE, CEMA and EGMF equipment will be impacted by an Ecodesign Regulation on light sources and separate control gears, the draft of which was presented to the Ecodesign Consultation Forum in December 2017.

Indeed, lighting products covered by the draft Regulation are integrated into materials handling equipment (e.g. industrial trucks, telehandlers and mobile elevating work platforms), agricultural machinery (e.g. agricultural tractors and combine harvesters), construction equipment (e.g. excavators and bulldozers) and garden equipment (e.g. lawnmowers).

Lighting products are typically installed in our equipment for road circulation purposes and they are also essential to ensure safety of workers in factory plants, construction sites and fields.

According to the current draft Regulation, lighting products would be out of the scope of the regulation only if they are installed in motor vehicles (as defined in Annex I point 1 (d)). We believe that our equipment should benefit from the same possibility, and this for several reasons:

- Our equipment is fitted with the same lighting products for on-road use as motor vehicles (e.g. tail, brake and headlights and direction indicators). A differentiation between equipment with and without public road application would thus lead to unfair competition, unnecessary additional effort for OEMs and confusion on the market.
- Our equipment presents a large variety of types reflecting the diversity of its purposes. Yet, it represents altogether small volumes compared to the automotive sector. Consequently, the current draft Ecodesign requirements are likely to affect the supply of appropriate lighting equipment for our equipment. Suppliers will not provide the same product range for the small volume non-road mobile machinery and tractors as they will do for cars and trucks.
- Contrarily to better regulation principles, there has been no assessment related to our equipment of the proposal's impact on the environment, consumers, manufacturers, innovation, costs and benefits.

Therefore, FEM, CECE, CEMA and EGMF believe that the abovementioned exclusion should be extended to lighting products for non-road mobile machinery (NRMM) as defined in the Regulation (EU) 2016/1628, and to agricultural tractors, trailers and towed equipment as defined in Regulation (EU) 167/2013.

To achieve this, propose the following changes to the draft Ecodesign Regulation:

1. Amend the current exemption on motor vehicles to also excludes tractors, agricultural trailers and interchangeable towed equipment as follows:

Annex I

1 (d) *“in or on motor vehicles, their trailers and systems, components, **interchangeable towed equipment** and separate technical units intended as set out in Regulation No 661/2009, Regulation (EU) No 168/2013, **Regulation (EU) No 167/2013** and their amendments”;*

2. Add exemption for lighting products which are used in or on non-road mobile machinery (NRMM) as defined in Regulation (EU) 2016/1628/EU:

Annex I

2. In addition, this Regulation shall not apply to:

(h) light sources and separate control gears in mobile machine, transportable equipment or vehicle with or without bodywork or wheels, not intended for the transport of passengers or goods on roads. This includes machinery installed on the chassis of vehicles intended for the transport of passengers or goods on roads.

About FEM

Created in 1953, the European Materials Handling Federation represents, defends and promotes European manufacturers of materials handling, lifting and storage equipment. FEM speaks for 15 members representing some 1,000 companies (mostly SMEs) employing 160,000 people directly and with an annual turnover of more than €50 billion. www.fem-eur.com

About CECE

The Committee of European Construction Equipment (www.cece.eu) is the recognised organisation representing and promoting the European construction equipment manufacturers and related industries to achieve a fair competitive environment via harmonised standards and regulations. CECE is a European network consisting of a secretariat in Brussels and national association offices in 13 different European countries. The industry behind CECE comprises 1,200 companies. In 2014, these equipment manufacturers had a total turnover of 25 billion € and employed 130,000 people directly. www.cece.eu

About CEMA

CEMA is the European association representing the agricultural machinery industry. For 50 years CEMA has acted as a network of national associations and provides services, advice and a common European industry view on relevant topics. The industry represented by CEMA includes 4,500 manufacturers of agricultural equipment employing directly 135,000 persons and indirectly in the distribution and service network another 125,000 persons. The companies are mainly small and medium-sized manufacturers according to the EU definition and they have a total turnover of 26 billion euro. www.cema-agri.org

About EGMF

The European Garden Machinery Industry Federation – EGMF – has been the voice of the entire garden machinery industry in Europe since 1977. With 30 European corporate members and 7 National Associations representing manufacturers of garden, landscaping, forestry and turf maintenance equipment, we are the most powerful network in this sector in Europe. www.egmf.org