

# NRMMs: closing a major gap in the EU's Internal Market through harmonisation of national road circulation rules

## THE CHALLENGE

In agriculture, Non-Road Mobile Machines (NRMMs) are machines such as combine harvesters, forage harvesters, sugar beet or potato harvesters (but excluding tractors). To drive, they are powered by an own engine (self-propelled).

In order to use them on agricultural fields they sometimes need to drive on public roads. To be allowed on public roads, they need to be authorized in each and every EU Member State and found to be compliant with the applicable national legislation (in terms of e.g. weight, width, lighting & signalling, braking of the machine).

Across the EU, manufacturers are therefore faced with a great variety of different national laws and approval requirements to ensure their machines can travel on public roads. Already in 2001, a study by the European Commission concluded that there is an urgent need to harmonize these laws and requirements at the EU level.

In 2014, the European Commission finally committed itself to develop the necessary legislative proposal by 2016.

## IMPACT



The Internal Market does still not exist for NRMMs. The persisting differences between EU Member States (regarding national road circulation requirements for NRMMs) continue to have a negative impact on users and producers of agricultural machines.

The diverging national rules result in an unnecessary and disproportionate cost burden for manufacturers – and particularly for the many Small and Medium-sized Enterprises (SMEs) – and stifles innovation and competition due to:

- additional workload during the development phase to meet diverging requirements
- considerable delays in the introduction of new machines
- enormous compliance costs due to multiple testing, multiple third-party certifications, including those for documentation requirements (which differ from country to country).



For customers, it means machines are more costly and cumbersome to use.

## CEMA POSITION & CALL FOR ACTION

CEMA supports the development of a harmonised regulatory instrument that takes into account existing EU legislation and the specificities of our sector (machines produced in low volumes for specialized use).

Benefits of European harmonisation would include:

- a consistent high level of safety on the road for NRMM across the EU
- increased uniformity for operators when using NRMM
- creating a level-playing field for all manufacturers, including specialist equipment manufactures and SMEs, as well as customers
- facilitating the design, testing, manufacturing, purchasing, operating and reselling of machines.

CEMA calls on the EU to speed up the harmonisation of road circulation requirements for NRMMs.

New EU framework legislation should enable manufacturers to provide a 'Declaration of Conformity' (DoC), without a mandatory third party certification (by e.g. a testing station).

*"The EU needs to deliver on the promise of the Internal Market. When it comes to travelling on public roads, farmers and producers of NRMMs should be able to enjoy the benefits of a unified Europe."*