



Industry Task Force reacts to the EC's view on future legislation on road circulation

IMAGE SOURCE: CECE - Committee for European Construction Equipment

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**CECE**, together with the Industry Task Force (ITF) on Road Circulation, developed a position paper reacting to the points identified during the European Commission's (EC) Workshop on Road Circulation for Non-Road Mobile Machinery.

The main goal of the document is to provide further explanations and clarifications on some of the points raised by the EC and Member States during the workshop. CECE has been working together within the ITF on Road Circulation with other industry associations dealing with agricultural machines, material handling, garden machinery and municipal equipment.

The ITF welcomed the proposal from the EC to rename the policy option as “simplified Type Approval” as it will provide more clarity to all stakeholders reducing the risk of misunderstandings. Also, the group agreed with the regulation being optional, highlighting that it is not necessary to apply this future regulation to place mobile machinery on the European market, just in case the manufacturer intends to allow it to circulate on public roads.

On the scope, the ITF reaffirmed its message against limiting the application of this regulation for mobile machinery with a design speed of less than 40km/h. Rather the maximum permissible speed at which a machine may actually travel on the road will continue to be regulated by national regulations. ITF also insisted that Towed Equipment should remain in the scope of the future legislation and included some clarifications regarding categories S and O.

On the policy architecture of the future legislation, the ITF agreed that the EC should not include any categorisation in its future proposal. In case the EC decides to do so, we believe that it is necessary to stress the link between categories with technical requirements, such as “braking” in the ITF document.

For the next steps, the ITF proposed a bilateral meeting with the Commission to address the remaining points where the group did not provide any feedback. To prepare for this future meeting, the CECE Project Team Road Circulation will work on the remaining action points and share its opinion with the ITF. Some of the topics to be addressed include:

- Maximum design speed 40 Km/h
- Demarcation line with other type approval legislation
- Towed equipment
- Restricted/Unrestricted Type Approval
- Conformity procedures

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