



CECE welcomes progress on NRMM technical requirements

IMAGE SOURCE: CECE

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13 December 2024 by CECE

- CECE has welcomed the publication of a study on technical requirements for the road approval of Non-Road Mobile Machinery (NRMM).
- The study, conducted by fka-TRL for the European Commission, was presented during CECE's November Technical Week.
- The study aligns with many industry proposals from the 2019 ITF document, particularly on steering systems and lighting requirements.

- **Concerns were raised about restrictions on machinery masses and dimensions, though the study's openness to "mean ground contact pressure" is seen positively.**
- **CECE emphasized that additional road use requirements might not add value, given NRMM equipment's intense workloads.**
- **CECE is monitoring the development of requirements for electric machinery under the NRMM Regulation's delegated acts.**

CECE has welcomed the recent **publication** of the study on technical requirements for the road approval of Non-Road Mobile Machinery (NRMM). The study, conducted by fka-TRL on behalf of the European Commission, was presented during CECE's November Technical Week, where members engaged in a thorough and insightful exchange on its findings.

This marks another significant milestone in the path towards implementing the Regulation on the approval and market surveillance of non-road mobile machinery circulating on public roads (hereafter: NRMM Regulation).

Once the NRMM Regulation enters into force, the European Commission will have two years to issue delegated acts outlining the specific technical requirements for road approval. The publication of this study represents a promising step forward, providing essential groundwork for these future regulations.

CECE members were particularly pleased to note that many elements of the study aligned with proposals previously made by the industry in the 2019 ITF (Industry Task Force) document. This alignment highlights the thoughtful work by fka-TRL and validates the industry's earlier contributions. Key examples include alignment on steering systems, as well as lighting and lighting installation requirements.

However, the study also highlighted areas of concern, particularly regarding masses and dimensions. Restrictions on machinery could pose challenges for manufacturers, although the study's openness to the use of "mean ground contact pressure" is a positive development. This approach could help manufacturers maintain a system closely aligned with current practices, avoiding the risks of a highly restrictive framework. It is also critical to ensure that existing exceptions granted at the national level are adequately reflected in future delegated acts.

Questions remain around the value of requirements such as structural integrity, which the study suggests are already sufficiently stringent under the Machinery Directive. CECE has emphasised that NRMM equipment is subjected to intense workloads during operations, far exceeding the stresses encountered during road

transit/transfer. As such, additional requirements for road use might not add substantial value.

CECE is also closely monitoring how requirements for electric machinery will develop under the delegated acts of the NRMM Regulation.

This comprehensive and well-aligned study represents a crucial step toward a robust and practicable framework for NRMM road approval, and CECE will remain actively engaged in the next steps.

Source: CECE