CECE Regulatory Update

17 October 2014, 8..00- 8.45am Crowne Plaza, Antwerp



CECE Congress 2014 - 15, 16, 17 October - Antwerp, Belgium



Visibility – Earth-Moving Machinery



Date: 10-Jun-14

Formal objection launched

The EU Commission has begun proceedings to remove the presumption of conformity relating to visibility of earth-moving machinery

- Petition raised by EU citizen
- Poor visibility cited as the main reason for number of incidents
- Petition upheld by Commission
- Likely result is withdrawal of the visibility
 standard for earth-moving machinery

Implications

The absence of a harmonised standard will lead to the removal of an obvious path to compliance with the Machinery Directive

- When standard is withdrawn manufacturers will have no standard on which to base design & testing related to visibility
- Each manufacturer will have to determine how to comply with Machinery Directive
 - Risk of market surveillance authorities having different interpretations of Machinery Directive
 - Compliance requirements could vary across EU

Development of visibility standard

How have the standards development bodies reacted to this situation?

- Standards development community reacted by proposing amendment to visibility standard
- Amendment is based on 5 principles (next slide)
- Target date for publication is late 2015
 - This means we face 12+ months without a visibility standard

Development of visibility standard

The visibility standard will be amended on the basis of:

- Direct visibility preferred
- Improvement in near field visibility
- Rear view interface devices (mirrors/monitors) to be positioned in front of the operator
- Mirror/camera performance must not be compromised moving parts of the machine "Mirror to mirror systems" shall not be permitted

What can CECE members do?

How can CECE help member companies during the period where we have no harmonised standard to provide the route to compliance

- We face period of time with no visibility standard
- A dedicated CECE project team has been established
- Guidance on how to deal with compliance in the absence of the visibility standard to be determined by project team

