



# 2021 EGMF Activity Report



# EGMF

## in a nutshell

The European Garden Machinery industry Federation – EGMF – represents manufacturers of garden, landscaping, forestry and turf maintenance equipment.



To learn more and keep updated on all of our activities, visit our [website](http://www.egmf.org), or follow us on [LinkedIn](https://www.linkedin.com/company/egmf-european-garden-machinery-industry-association) and [Twitter](https://twitter.com/EgmfEu).



[www.egmf.org](http://www.egmf.org)



[linkedin.com/company/egmf-european-garden-machinery-industry-association](https://www.linkedin.com/company/egmf-european-garden-machinery-industry-association)



[twitter.com/EgmfEu](https://twitter.com/EgmfEu)

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# President's Message

Our society has faced an extraordinary challenge that impacted businesses, workers, and citizens alike. Throughout 2021, the ongoing pandemic continued to severely disrupt our industry, our supply chains and our distribution channels.

Despite the difficult challenges, I saw our industry, and EGMF alike, adapting to the changing landscape, embracing virtual meetings and new ways of working. Building on our creativity and innovative spirit, we emerge even stronger.

Throughout the crisis, members' engagement, solidarity and cooperation in our association have been key elements for success. Working together is essential to create value as well as to respond to present and future challenges.

In a fast-changing business world, the Covid-19 pandemic even accelerated trends like electrification, digitalisation and the growth of e-commerce. Responding to these trends ranks high in the activities of EGMF and our members. Some of the key initiatives of EGMF included guidance on e-commerce and competition law, a strong focus on shaping industry friendly regulations and bi-annual market surveys to help better understand trends in our industry, notably the rise of battery powered equipment.

It is important to state that EGMF members are fully supportive of the EU's goal to be climate-neutral by 2050. We will work with EU institutions to develop a balanced regulatory framework that achieves this goal while preserving existing and creating new industry jobs while investing in new innovative technologies.

Innovation is our answer to shape the future of our industry and our society. The pandemic has raised the vital role of nature and our need to preserve it is greater



**Rasto Nichta**

EGMF President

than ever before. A green and clean environment provides significant health benefits to citizens. Our industry benefits from growing demand for preserved and well-maintained green spaces, resulting in quick recovery and record industry results over the 2020 and 2021 period.

Our members continue to play a key role in maintaining and beautifying environment around us and share the responsibility for improving green infrastructure in order to make the world cleaner and greener.

# EGMF

## Mission

The European Garden Machinery industry Federation – EGMF – has been the voice of the garden machinery and outdoor power equipment industry in Europe since 1977. Our industry consists of manufacturers of garden, landscaping, forestry and turf maintenance equipment.

The garden and outdoor power equipment sector plays a critical role in European society. Our industry shares with households, municipalities, landscapers and greenkeepers the responsibility for green area maintenance which improves the quality of our lives.

## Mission

**To serve as a spokesperson for the manufacturers of outdoor power equipment on pan-European matters as well as to be recognised by the key regulatory bodies.**

**To provide expertise to stakeholders on technical, marketing, market data, and trends related to the garden and outdoor power equipment industry.**

**To provide an effective forum for exchange of information and knowledge about our sector and its equipment and services as well as looking towards new challenges and trends for the sector.**

# EGMF Footprint

EGMF is an international not-for-profit association established in Brussels.

EGMF is the most powerful network representing the garden machinery and outdoor power equipment sector in Europe.

We bring together:



**30 companies**

(26 full members and 4 associate members)



**7 national associations**

## New member

In 2021, Emak joined EGMF.



**Emak**<sup>®</sup>

**our power, your passion**

Based in northern Italy, the Emak Group is a global manufacturer. The Group offers a wide

range of products, including outdoor power equipment. This segment includes activities for the development, manufacture, and marketing of products for gardening and forestry activities and small machines for agriculture.

EGMF continues to look for new members with the aim of further reinforcing its representativeness, strength and expertise.

EGMF's member categories:

- A full member is a manufacturer of garden, landscaping, forestry or turf maintenance equipment which is registered in Europe.
- An associate member is a company which is registered in Europe, having an ancillary activity supporting manufacturing or marketing of garden, landscaping, forestry or turf maintenance equipment.

## Cooperation: a key element of EGMF strategy

At EGMF, we fully believe in cooperation. Sharing knowledge, experience and connections is part of our strategy.

First, the seven **National Associations**, which are members of EGMF, are the voice of the garden machinery sector at national level. They both represent the smaller companies in our sector and are the main contact point for national authorities and standardisation bodies.

In addition, we join forces with other **European associations**. We collaborate on a regular basis with fellow organisations in the mechanical engineering sector, notably CECE, CEMA, EPTA, Euromot, Europgen, Eunitied, FEM and Orgalim, to respond to common regulatory challenges.

Building on very successful experiences in previous years, EGMF continues involvement in the Industry Task Force

(ITF): working groups gathering the non-road mobile machinery industry.

Furthermore, EGMF has also engaged in ad-hoc coalitions on very specific issues, including the future Batteries Regulation and wider industry platforms such as the Umbrella Project on RoHS exemptions.

At **international level**, EGMF maintains a very close relationship with its US counterpart, the Outdoor Power Equipment institute (OPEI). These regular contacts help to share expertise on the respective markets and better understand regulatory challenges our industry face on both sides of the Atlantic.

EGMF is also involved in the International Internal Combustion Engines Manufacturers Association (IICEMA), which aims to exchange information on engine emissions in different parts of the world.

# Garden machinery industry: EGMF market analysis

Despite the many disruptions and challenges our industry faced, 2020 was a record year for the outdoor power equipment market in Europe.

In 2020, our members sold 19.4 million units on the European Market (39 countries) compared to 17.5 million units in 2019.

As was the case with the whole European economy, the Covid-19 outbreak severely hit our industry until April 2020 – a period that usually shapes the business outlook for the whole year.

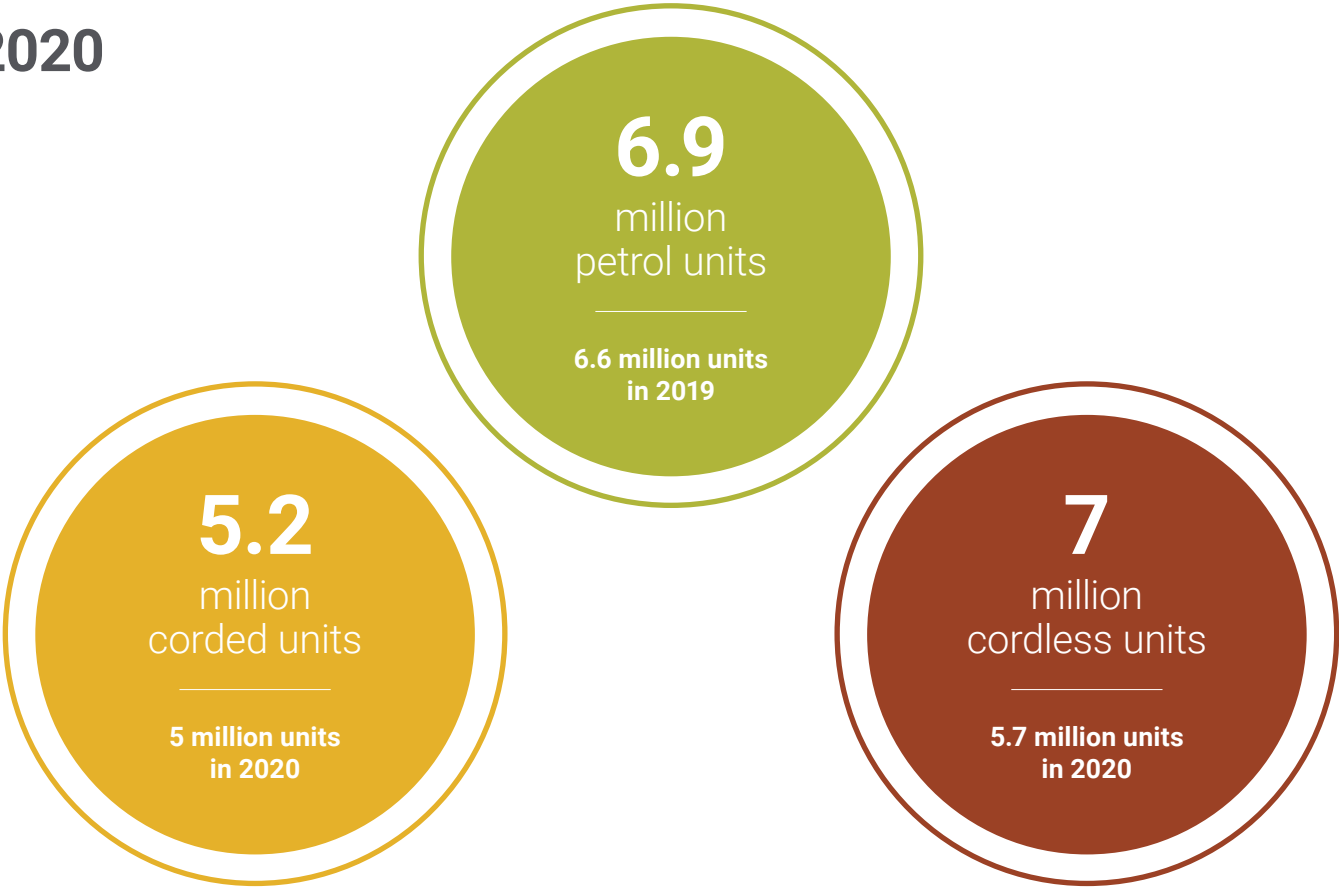
After this dramatic slowdown, the European market started to recover in May along with the growth of grass, plants, and trees. Being intrinsically linked to natural cycles and weather conditions, green area maintenance operates according to seasons. Unlike usual patterns, the economic performance improved over the summer and the growth continued in the second semester.

The Covid-19 pandemic and the series of lockdowns resulted in extended time spent at home, which largely benefited the garden machinery and outdoor power equipment sector. Homeowners connection to their living landscape increased as well as their investment in their garden. This investment trend in outdoor spaces, notably green areas, continued in 2021.

While 2020 has been a very positive year in general, trends fluctuated at regional level depending on the magnitude of the Covid-19 outbreak. The growth also varied depending on product categories as not all categories of equipment benefited from the ‘cocooning’ effect in an equal manner.

Additionally, the EGMF market surveys showed a growth driven by electric cordless equipment. Powered by innovation and consumer demand, this strong shift towards battery is enhancing the electrification of our industry.

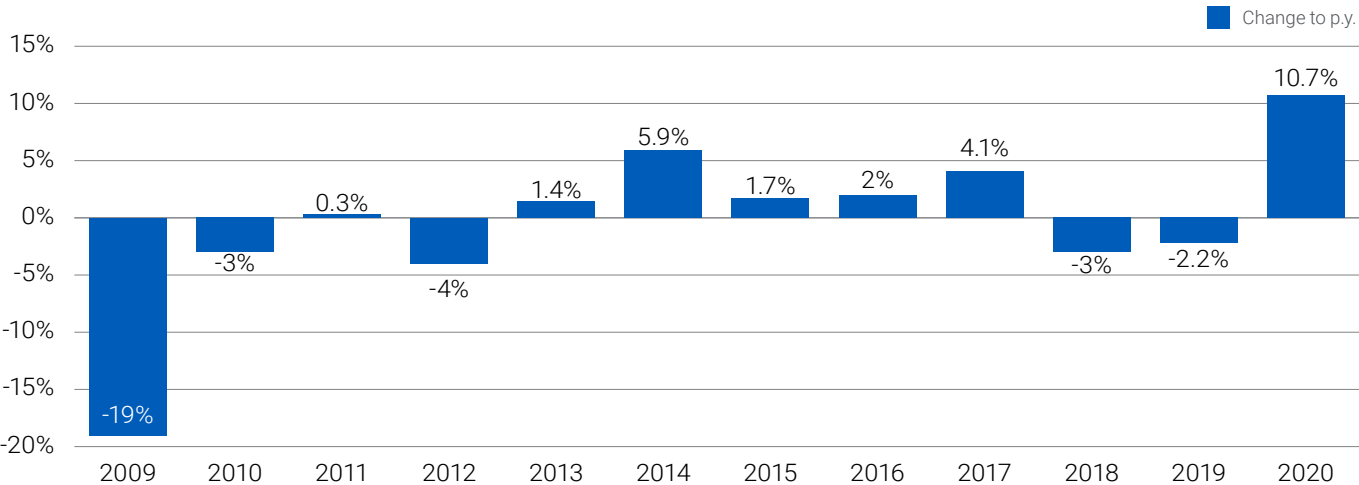
## 2020



# Evolution of EGMF volumes

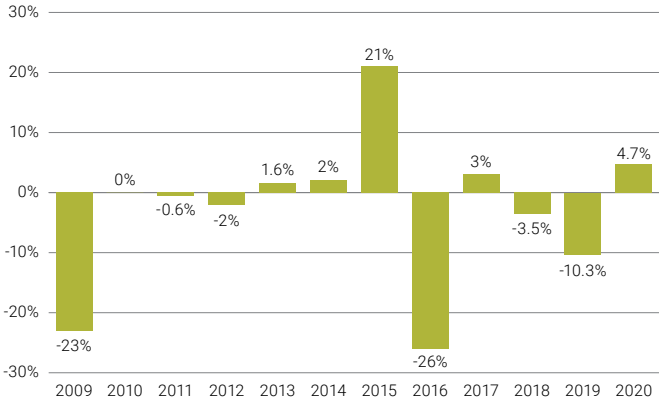
Year-by-year evolution (in %)

Total volumes

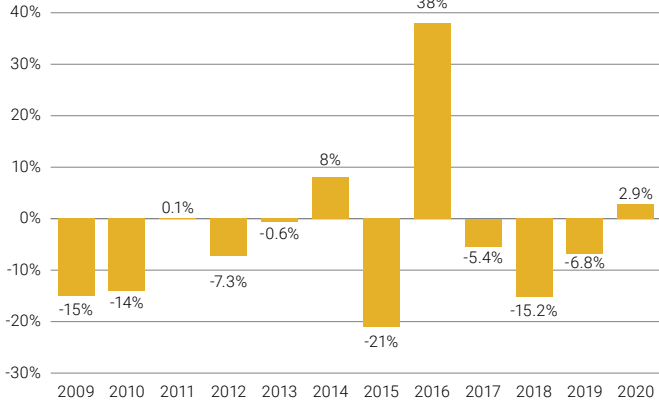


## Volumes per type of power source

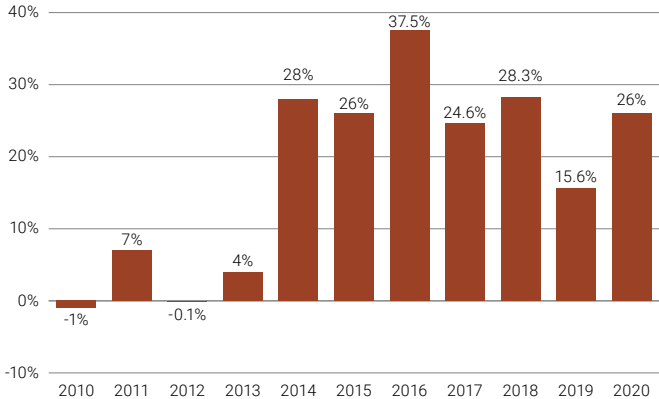
### Petrol



### Corded



### Cordless





# Governance

## Governing bodies

The EGMF Board is elected by the General Assembly and is composed of representatives of our corporate members. The Board drives the association’s strategy and supervises the management of the association.

### EGMF Board 2020-2022



**Rasto Nichta**  
President (Toro)



**Andreas Rangert**  
Vice-President (Husqvarna)



**Carlos Aragones** (John Deere)



**Franco Bastasin** (Stiga)



**Rudolf Harrer** (Honda)



**Gary King** (Bosch Lawn & Garden)



**Marcel Berben** (Briggs & Stratton)



**Thomas Meyer** (Etesia)



**Alexander Schönfeld** (MTD)



**Wolfgang Simmer** (Stihl)

## Working bodies

The Technical and Marketing Committees are driving the EGMF work on technical, regulatory and marketing matters.

These two committees, and their several task forces, are bringing together the knowledge and experience of more than 150 experts from both national associations and companies.

## EGMF Team

The daily work of EGMF is coordinated by the EGMF office. Based in Brussels, the EGMF team manages the engagement with the EU institutions, thus supporting EGMF outreach.



**Anne Claire Rasselet**  
Secretary General



**Ioana Smarandache**  
Regulatory matters  
(internal market)



**Timothée Tierny**  
Regulatory matters  
(environment & sustainability)



**Dimitar Kolichev**  
Regulatory matters  
(environment & sustainability)



**Dale Camsell**  
Technical Desk Officer



**Alina Burlacu**  
Administration and Statistics

# EGMF Code of conduct

EGMF operates by fully respecting EU competition rules. EGMF members are bound by a Code of Conduct, which they must abide by at all times, notably during and around meetings.

## Code of Conduct

EGMF believes it is important that its activities are at all times carried out in accordance with the applicable law, especially competition law. EGMF believes that business shall be conducted in an atmosphere of free competition, i.e. on the basis of price and quality. EGMF recognises that competition law intends to stimulate free competition, something which has EGMF's full support. EGMF feels it is important to confirm this by adopting a Code of Conduct. This Code of Conduct shall be binding on all members as well as on other participants when taking part in activities of EGMF. The Code of Conduct aims at providing clear rules to EGMF's members, thus reducing the risk of improper conduct and consequently of fines being imposed.

The following rules shall at all times be respected within EGMF:

### CORE PROCEDURES

1. Meetings of a body, committee, working group or other form of cooperation within EGMF shall only take place after the members have been invited to the meeting in writing. The notice inviting to the meeting shall also include the agenda of the meeting.
2. Minutes shall be kept of each meeting as referred to in 1., above; these shall be sent to all members of the relevant body, committee, working group or other form of cooperation. The minutes shall be kept in an organised form for a period of at least 7-10 years.
3. Consultations and discussions in a body, committee, working group or other form of cooperation on the topics on the agenda and other topics, where these are related to the market (i.e. topics that may be of interest for the position and for determining the position of the individual members in competition), shall be limited to the official meeting, of which minutes will be kept.
4. During the consultations as referred to in 3., above, it shall not be decided to discuss certain topics during the meeting subject to the condition that this will not be recorded in the minutes. If such condition is stipulated the chairman of the meeting shall refuse to proceed to discuss the topic in question.
5. Each meeting of a body, committee, working group or other form of cooperation during which market-related topics are discussed, shall be attended by at least one staff member of the association. This staff member will monitor topics that are sensitive from a competition law point of view. If there are doubts about such sensitivities, the topic shall not be discussed until the advice of an expert in the field of competition law is obtained, and this advice is to the effect that the topic may be discussed without any objection, or until the limits to be observed during the discussion are clear.

#### A. PROHIBITED TOPICS

The following topics are prohibited and out of bounds during meetings of bodies, committees, working groups or other forms of cooperation within EGMF, particularly as far as information on these topics is exchanged between companies which might be considered as competitors:

- Sale prices, rates, (intended) price adjustments, recommended prices, discounts, mark-ups and other price-related topics concerning products or services of member companies;
- Division/sharing of the market, e.g. by allocating a specific geographical area, specific customers or specific groups of customers to specific members;
- Restriction of production or sales;
- Pre-consultations with respect to responses to invitations to tender of potential clients;
- Charging on offer costs of competitors in one's own offer;
- Exchanging market information by the individual members, i.e. information about production, turnover, sales, investments, divestments, R&D expenses and other information, as far as this is related to specific (categories of) products or services, that may be regarded as commercially sensitive information;
- Publishing of the average price or of the price bandwidth within the sector;
- Exclusivity for specific members to represent producers and importers;
- Boycotting specific suppliers or customers;
- Any other topic that could lead to coordination of market behaviour restricting competition;
- Pre-consultations between competitors when responding to invitations to tender (in tender procedures with both public and private purchasers);
- Agreeing that all competitors add a surcharge to their bid (which would then be used for "compensating" the bidding costs of those companies that would not win the tender).

#### B. TOPICS THAT MIGHT PRESENT A PROBLEM

The following topics might, under certain circumstances, present a problem from a competition law point of view, but especially in a highly concentrated, oligopolistic market (i.e. a market with only few players). This means that these topics shall at all times only be discussed within the context of EGMF in proper consultation with an expert in the field of competition law:

- General terms and conditions of sale and delivery. If these pertain to sensitive competitive parameters (e.g. prices, rates, manner of indexation, on-charging specific costs) or if the use of the conditions is mandatory, the competition authorities may object;
- Restrictions on participating in trade fairs. As a general rule, each company should be free to participate in any trade fair it likes and companies should not be asked to boycott any trade fair. Restrictions to this freedom to participate are only allowed under specific conditions. Collective bargaining by the members of EGMF to obtain a better price or other conditions from the trade fair organisation does not constitute a problem under competition law;
- Schemes for recognition/membership criteria. For as long as recognition or membership of EGMF does not play a decisive part for the potential customer when choosing a product or service, there are no objections to this from a competition law point of view. As soon as the customer does find this important, however, these schemes must satisfy specific criteria;
- The secretariat of EGMF is allowed, in principle, to collect commercial information about individual companies and to make this information available to the members in an aggregated manner. It must in any event be absolutely guaranteed that no information on individual companies can be deducted from this aggregate information. In some countries the national competition authorities will only allow such statistics systems if the collected information can be qualified as sufficiently historical, e.g. (depending on the circumstances) presenting data of at least one year before, and/or if the information is made publicly available.

#### C. TOPICS THAT DO NOT PRESENT A PROBLEM

The following topics constitute the core business of most of EGMF's activities and discussions and consultations on these topics do normally not present any problem under competition law, provided that the topics mentioned under A. are not touched upon:

- General cyclical economic data and business climate, as long as discussions on these topics do not relate to any individual company's behaviour. These discussions focus on the macro level and do not affect any company's behaviour in the market;
- Lobbying activities relating to general interests in the sector and concentrating on legislation and other public issues which may affect the sector;
- Labour law and social issues. These issues are considered to be irrelevant under competition law;
- Legal issues. These issues are by definition of a general nature, as these will affect any company's business to the same extent;
- Standardisation issues, if (i) the standard-setting procedure is transparent and open for participation by any interested party, (ii) there is no obligation to comply with the standard, (iii) access to the standard is provided on fair, reasonable and non-discriminatory terms, and (iv) any discussions within the standard-setting procedure are restricted to technical aspects. Standardisation is aimed at compatibility of products and at technical progress; this will normally be to the benefit of the end user;
- Safety and health issues. EGMF has an interest in enhancing safety and health with respect to the use of the sector's products;
- Environmental issues. EGMF has an interest in enhancing protection of the environment with respect to the use of the sector's products.



# Our work

2021 has been a year of disruption, continuity, and resilience.

This year has been marked by the global pandemic and an unprecedented crisis impacting business and supply chains, workers and citizens. It also meant adapting to a new online environment.

In the face of this challenge, EGMF has proven to be resilient alongside the whole garden machinery industry, as shown by our bi-annual market surveys.

Firstly, we have worked to facilitate the data collection process and improve the data quality to increase the value of EGMF market surveys, reinforcing the relevance of this well-established indicator.

Additionally, EGMF continued to be the voice of the outdoor power equipment industry in Europe. Raising the visibility of our association was a permanent objective through advocacy activities towards EU decision makers, online events and increased presence on social media.

2021 has also been marked by the ambition to move towards a climate-neutral society – a pillar of Europe's Recovery Plan. More than ever, we worked on sustainability, especially regarding the future regulation on batteries. Thanks to EGMF's webinar held during European Green Week, we have also prepared the ground for the upcoming talks and legislative framework on Sustainable Products.

In parallel, the digital transformation – the second EU priority – triggered the revision of the Machinery Directive, a key legislative pillar and top priority for EGMF. The European Commission introduced digital documentation in its proposal, marking a great achievement for EGMF. However, the battle is not over.

Throughout the years, we have provided early information on regulatory changes and built expertise, notably through guidelines on multiple issues including Brexit, exhaust emissions and product compliance.

Furthermore, EGMF took a closer look at changes disrupting our industry, especially multi-channel business and e-commerce. EGMF published a Guidance Paper and dedicated a webinar to shed light on the mindset to adopt and permissible practices in an evolving framework.

Going forward, 2022 promises to be an extremely busy, yet exciting, year. Many regulatory files will be driven in parallel aiming to make Europe greener, more digital, and more resilient. Unity in a diversified industry will be necessary to face the upcoming challenges and close cooperation will continue to be an integral part of EGMF's strategy.




**Anne Claire Rasselet**

Secretary General

# Our work in numbers



**50+**  
Internal meetings of the  
Technical and Marketing  
Committees, including  
task forces



**2**  
Market surveys on 14  
categories of equipment  
and 39 countries



**7**  
Information Bulletin,  
including 2 Bulletin's  
dedicated to Brexit



**4**  
Newsletters



**24**  
Positions adopted, including  
letters, responses to  
consultations and joint  
statements with fellow  
organisations



**4**  
Guidance documents  
for our industry



**16**  
Updated Compliance Guides  
on outdoor power equipment  
for market surveillance  
authorities



**3**  
Webinars and training  
sessions

## EGMF market surveys

EGMF runs market surveys, twice a year, for several types of outdoor power equipment.

Our surveys cover 14 equipment categories and 39 countries. Based on input from all corporate members, these bi-annual market surveys provide a well-established indicator for the garden and outdoor power equipment market in Europe.

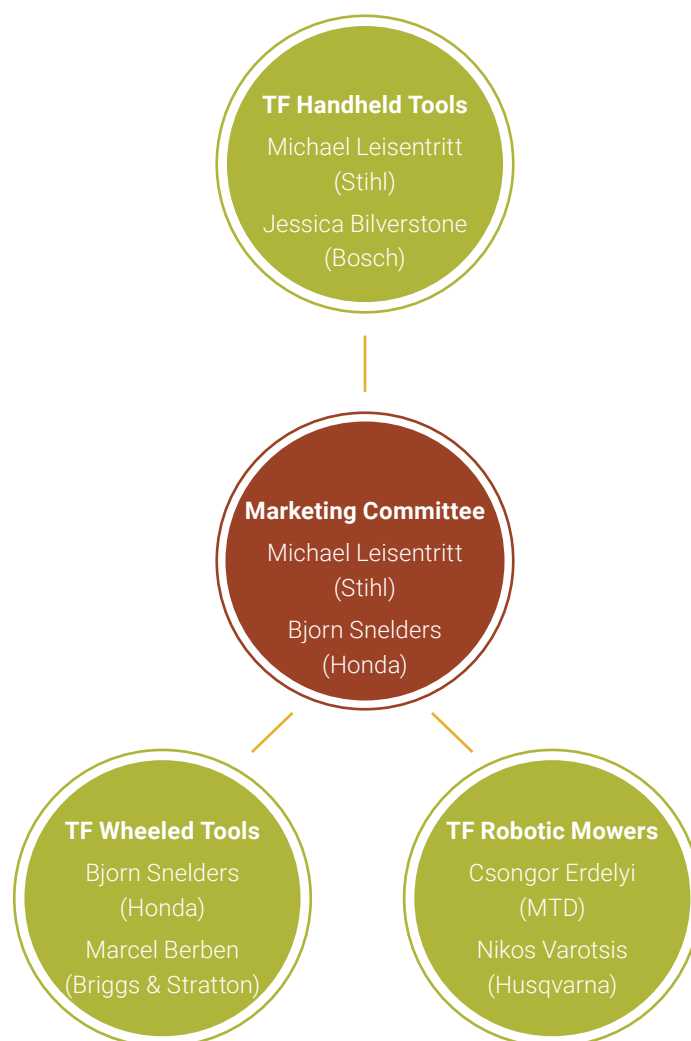
The EGMF Marketing Committee, composed of representatives from companies and national associations, oversee the development of these surveys. This Committee also works on continuously improving our statistical tools, notably the product categories and sub-categories in order to adapt it to market changes and provide a better market analysis.

In addition, EGMF is continuously improving its online statistical platform to facilitate the collection process and

improve the quality of data. In addition to enabling the automation of data collection, this platform now allows members to directly download the market reports in several formats.

The Marketing Committee also acts as a forum, offering a platform to discuss trends in the green area maintenance sector. At the spring meeting, we welcomed a representative of the European Commission to discuss the future of biodiversity and EU policy on green urban spaces.

The Marketing Committee includes three task forces focusing on specific types of equipment: handheld tools, wheeled tools, and robotic mowers. The Committee is chaired by Michael Leisentritt (Stihl), who is supported by Vice-chair, Bjorn Snelders (Honda).



# EGMF regulatory and advocacy activities

The regulatory environment is permanently evolving and previous months were no exception. Therefore, the work on technical and regulatory matter remains the main pillar of EGMF activities.

Regulatory activities are driven by the Technical Committee, which is composed of technical experts from companies and national associations. The Committee keeps up to date on EU regulatory developments

impacting the garden machinery sector and defines priorities.

As an overarching body, the Technical Committee coordinates the work of eight task forces and two working groups. These working bodies shape the association's position to speak as one voice.

Fabio Ricci (FederUnacoma) has been leading the Technical Committee since July 2015 and is supported by a Vice-Chair: Paul Zwolinski (Makita).



## 1. Internal market

Ensuring garden machinery is safe when placed on the EU internal market has always been a core objective pursued by EGMF in its regulatory and technical activities. Machine safety, noise and exhaust emissions, as well as electrical safety are different areas EGMF members pay close attention to in order to complete the puzzle of overall product safety.

The ever more demanding regulations on these different aspects form a big part of EGMF's policy activities and interests in the EU internal market area. In general, EGMF calls for a coherent and reliable regulatory framework that provides the necessary predictability and enough room for innovation. In addition, EGMF also advocates for more effective and coordinated market surveillance across the EU to achieve a robust and well-functioning single market.

In 2021, EGMF members continued to work hard on issues related to the internal market. Amongst the many topics covered, the review of the Machinery Directive has been a top priority.

### Machinery legislation

The Machinery Directive is one of the core pieces of legislation for the garden and outdoor power industry, continuing to ensure a high level of safety of machinery products in the EU.

EGMF has been very active in the preparatory phase of the revision of the Machinery Directive since 2019. We have liaised closely with the European Commission during the consultation process and in the run-up to the publication of the [legislative proposal](#) in April 2021.

EGMF's main highlight of 2021 is the start of an advocacy campaign on the new Machinery Regulation proposal. Our biggest achievement in the Commission's proposal is the introduction of digital documentation, allowing manufacturers to supply information to product users and authorities in a digital manner. This outcome is mainly due to EGMF's proactive engagement to promote digital documentation and suggest viable solutions in this direction.

Most meetings of EGMF Machinery Task Force, since May 2021, were dedicated to the preparation of our [position paper](#) on the Machinery Regulation proposal that was disseminated in July 2021. In addition, several meetings with key decision-makers in EU institutions were held to promote EGMF's core messages. EGMF has voiced concerns on proposed changes about conformity assessment procedures, notably the removal of the self-assessment option for high-risk machinery.

In the coming months, EGMF will continue to engage with decision-makers in the European Parliament and Council,

with the aim of shaping a future legislation that strikes the right balance between safety and maintaining our industry's competitiveness.

### Outdoor Noise Directive

The Outdoor Noise Directive remains a priority issue for EGMF, although the revision process moves at a slow pace. While some types of outdoor power equipment are subject to labelling requirements only, others must also comply with noise emission limits.

In 2021, EGMF [called](#) to fix measurements methods before launching a lengthy revision. This was a success as the European Commission will follow this approach. Subsequently, EGMF prepared recommendations to update noise measurement methods according to state-of-the-art standards.

In the coming months, EGMF will continue cooperating with the Commission, notably through participating in the Expert Group and with fellow organisations to align industry recommendations. EGMF is currently leading Orgalim's working body dedicated to outdoor noise.

### Road circulation

EGMF aims to deepen the EU Single Market and reduce administrative burden for the mobile machinery in the area of road circulation. Further harmonisation will remove market barriers and cut unnecessary costs for our industry, while also bringing benefits for users and authorities.

To achieve these objectives, EGMF continues to promote the harmonisation of road circulation technical requirements for self-propelled mobile machinery through a European Regulation and cooperate within the Industry Task Force (ITF).

As part of the preparatory process of the legislative proposal, EGMF responded to a public consultation in early 2021. We supported the policy option of a "hybrid" regulatory framework. This is a combination between EU type-approval of the whole mobile machine granted by national authorities and the New Legislative Framework model applicable to most CE marking legislation.

Another key activity in 2021 was EGMF's participation in the stakeholder workshop on 6 May. This event allowed Member States and the industry to exchange on various technical aspects. As a follow up, the EGMF Task Force Road Circulation prepared technical input and fed it into the industry consolidated response to the European Commission.

EGMF will continue to engage with the European Commission in the coming months in anticipation of the legislative proposal which is expected in 2022.



## Radio Equipment Directive

EGMF has worked on a draft Delegated Act supplementing the Radio Equipment Directive. Addressing specific cybersecurity aspects, this initiative may impact robotic lawnmowers as it applies to internet-connected radio equipment that can itself communicate over the internet, either directly or via another equipment.

In March 2021, EGMF issued a position paper on the draft Delegated Act to narrow down the proposed scope of internet-connected devices and request a longer transitional period than thirty months. This Delegated Act is expected to be published by the end of 2021.

## Exhaust emissions

EGMF, together with other likeminded associations representing the Non-Road Mobile Machinery (NRMM) industry, updated two Guidelines in January 2021. The first one focuses on [Regulation \(EU\) 2016/1628 setting exhaust limits for NRMM engines](#) and the other on the compliance of NRMM and its engines with the NRMM Regulation.

This update was mainly triggered by the publication of Regulation (EU) 2020/1040 amending transitional provisions to address the impact of the Covid-19 crisis which was a fundamental political success for our industry in 2020. It extended the 2020 deadlines for the production and placing on the market of NRMM fitted with <56kW and ≥130kW transition engines by 12 months.

## 2. Digitalisation

EGMF's focus within EU digital policy has been predominantly focused on the proposal for an Artificial Intelligence (AI) Act, released together with the Machinery Regulation in April 2021.

The main task of the EGMF Working Group on Artificial Intelligence and Cybersecurity was to analyse the AI proposal and identify any potential impact. The Working Group concluded that EGMF products, including robotic lawnmowers, are not per se directly impacted by the concept of machine learning introduced in this legislative proposal.

Nevertheless, EGMF will continue to closely monitor developments on the AI Act. The main reason being the interlink with the future Machinery Regulation, particularly in terms of the definition of AI systems which can be embedded in machinery products.

## 3. Sustainability and Circular economy

As an industry close to nature, improving and promoting sustainability is a strategic priority. Manufacturers are continuously striving to develop technological solutions

to maintain green areas not only efficiently, but also with minimum impact on the environment.

Today, manufacturers face ever more demanding and permanently evolving requirements that are regulating a products' life cycle, from the design to the waste management. While we strongly support Europe's ambition to make sustainable products the norm, the EU legislation should enhance innovation.

Circular economy and, more broadly, sustainability will continue to rank high on EGMF's agenda as they are at the core of our industry' strategy and the green transition of the European Commission.

## Batteries Regulation

The publication of the European Commission's proposal for a [revised Batteries Regulation](#) in December 2020 triggered a lot of hard work and several rounds of internal discussion.

Considering the electrification trend in our sector, the future Regulation will influence the future of our industry. In April, EGMF published its [position paper](#) that provides a series of recommendations to shape a more balanced regulation. We support sustainable battery production in Europe while aiming to minimise the administrative burden and redesign of products to avoid shortcomings hampering the electrification and setting realistic waste collection targets.

In addition, we held meetings with key decision-makers in the European Parliament and the Council to promote our main messages.

Moreover, EGMF pursued its cooperation with industry associations. In a [joint statement](#) published in July, EGMF and several associations called for a realistic timeline to implement the new Regulation. We also teamed up with EPTA (the European Power Tools Association) to build advocacy tools on specific issues such as deposit systems for batteries.

Finally, the Task Force Battery will continue to closely follow the legislative process in the Parliament and Council which is expected to be finalised in 2022.

## Transport of batteries

In spring 2021, EGMF joined the '[BatteriesTransport](#)' initiative. This joint industry initiative aims to enhance compliance with international legislation and safety for the transport of batteries, including when integrated into equipment.

## Ecodesign and Energy Labelling

In 2021, the activities focused on the future Ecodesign and Energy Labelling Working Plan that will guide the European Commission's work. The main point of concern was a potential measure imposing universal/interoperable batteries, which EGMF actively opposed in consultative

talks. Advocacy efforts paid off as interoperable batteries were not listed in the final study recommendation, nor in the draft Working Plan.

In parallel, we welcomed the disbanding of the regulatory work on high pressure cleaners, rewarding EGMF's advocacy initiatives in past years.

The task force will continue closely monitoring all further developments related to the Ecodesign and Energy Labelling Working Plan that is expected by the end of 2021.

## Circular economy and Sustainable Products Initiative

The EGMF Task Force Environment and Ecodesign closely observed the activities announced by the [new EU Circular Economy Action Plan](#), which is one of the main building blocks of the European Green Deal.

As our first activity, in November 2020, EGMF and EPTA put forward recommendations on the main initiatives announced, including sustainable products, green claims, consumers empowerment and Chemicals Strategy.

EGMF efforts focused on the [Sustainable Products Initiative](#). This aims to make products more sustainable, durable and circular, notably by broadening the Ecodesign Directive and introducing of Digital Product Passports.

Under the umbrella of the European Green Week, EGMF and EPTA organised a webinar on Sustainable Products in May 2020. We welcomed the Head of Unit leading this file at the European Commission and a Member of the European Parliament who shared insights and expectations to develop sustainable production and consumption. In front of over 80 attendees, EGMF and EPTA representatives put forward achievements and goals taking us towards more sustainability in our industry.

In the summer, we shared EGMF views on concrete proposals and our recommendations for the future regulatory framework through responding to the Commission's public consultation, which we backed with a [joint position paper](#) with EPTA.

In 2022, Circular Economy will continue to rank high on the EGMF agenda. We will continue our work the Sustainable Products Initiative and related regulatory proposals that will be tabled in the coming months.

## REACH Regulation

The Task Force Chemicals and Waste is closely following authorisation and restriction processes under the REACH Regulation.

In 2021, EGMF closely monitored ongoing discussions aiming to restrict polyfluoroalkyl chemicals (PFAS) that are used in various industrial applications and manufacturing processes. In addition, EGMF worked on a parallel restriction process targeting one specific family

(undecafluorohexanoic acid, PFHxA) used for various applications in garden machinery, such as hose, O-ring, oil seal, wire and cable. EGMF advocated for an exemption for non-road mobile machinery and spare parts.

EGMF has also closely followed the new Chemicals Strategy for Sustainability. It sets out the European Commission roadmap to achieve the EU's zero pollution ambition for a toxic-free environment.

In 2022, EGMF will work on the revision of REACH and the definition of new concepts, such as 'essential use' and 'substances of concern', in close cooperation with Orgalim.

## RoHS Directive

EGMF is working on the upcoming revision of the RoHS Directive in parallel to its implementation as this directive applies to most garden machinery, including combustion-engine powered equipment since July 2019.

First, the EGMF Task Force Chemicals and Waste held a meeting in February with the two RoHS Policy Officers from the European Commission. The Commission's representatives and EGMF members exchanged views on the upcoming review, renewal of exemptions and potential restriction of additional substances. EGMF also took the opportunity to highlight positive aspects and reiterate our call to simplify the renewal process for exemptions that is lengthy and inefficient.

In addition, EGMF has been closely following the renewal of exemption beyond 2021 through the Umbrella Project – a cross industry platform. Pushed by EGMF, EUROMOT and Japanese Business (JBCE), the European Commission integrated the revision of exemptions for new equipment falling in RoHS scope (i.e. combustion engine equipment) in the ongoing evaluation process for other equipment categories, rather than reiterating this process in 2023.

## Waste Policy

EGMF has been involved in advocacy work on SCIP database, the newly launched database for information on substances of concern in articles or in complex objects (products) established under the Waste Framework Directive.

Until its implementation in early 2021, EGMF voiced the concerns of our industry on the unnecessary administrative burden, lack of time and risks for sensitive information.

In addition, EGMF has been actively involved in a joint industry initiative, gathering more than 40 industry associations. Together, we called on policymakers to postpone the implementation and reshape the database to make it more workable. Despite the multiple industry initiatives towards all decision makers, the European Commission, ECHA, European Parliament and Council,

the industry did not receive the necessary political support.

## 4. Enforcement

EGMF is an advocate for effective, coordinated, and robust market surveillance, which is key for a well-functioning Single Market.

EGMF manufacturers have heavily invested over the years to guarantee their products fully comply with the requirements in applicable EU legislation on product safety, sustainability, and environmental protection. Compliance and enforcement rules in Europe need to ensure a level playing field between market operators to avoid that any counterfeit and non-compliant products make their way into the EU market.

### Market surveillance

EGMF's key activity focused on the review of the Blue Guide on the implementation of product legislation with two main contributions to the Commission's consultation. Firstly, in November 2020, on the Blue Guide as a whole, and secondly, in March 2021, on specific chapters related to the EU standardisation process and the role of harmonised standards.

EGMF will continue working on the Blue Guide, with the final version expected by the end of 2021.

### EGMF compliance guides

In March 2021, EGMF updated its [compliance guides](#) for various types of outdoor power equipment, notably to reflect changes in the legislation. These compliance guides were developed to assist market surveillance and border control authorities in checking compliance of different types of EGMF equipment with applicable EU legislation.

EGMF conducted a full-blown promotion campaign on these compliance guides. We mainly targeted the informal groups of market surveillance authorities at the EU level and relevant contacts in the European Commission.

Thanks to the work done by our National Associations, the EGMF compliance guides were also translated in Italian and German.

## 5. Trade and market access

As essential element for competitiveness, free and fair access to markets is of strategic importance for manufacturers of outdoor power equipment. EGMF fully supports the conclusion of agreements with our most strategic trade partners, especially the United Kingdom.

In addition to this, we fully support continuously deepening the Single Market, notably through standards. Therefore, the EU standardisation system is of core

importance to EGMF, not only at members' level through their involvement in relevant national, European, and international standardisation organisations, but also at strategic level. We support the EU's global leadership role in standardisation and advocate for a EU's political vision that supports industry needs.

### BREXIT guidelines

Together with EPTA, EGMF created a joint working group and Guidelines for placing products on the EU and UK markets in the context of Brexit.

Published in March 2021, the joint EGMF-EPTA Guidelines set out comprehensive information and guidance to manufacturers on what elements to consider when placing products on the EEA, Northern Ireland (NI) and Great Britain (GB) markets from 1 January 2021.

### Standardisation policy

Over the last year, EGMF has been actively participating in the industry roundtable on standards, so-called SMAART. In this forum, EGMF coordinated with Orgalim and other industry stakeholders to put increasing pressure on the European Commission to resolve current bottlenecks in the system, for instance, non-citation of harmonised standards. In addition, in early 2021, EGMF co-signed an [industry joint letter](#) addressed to the Presidency of the Council, challenging the Commission's over-prescriptive approach to harmonised standards and making concrete recommendations to resolve the situation.

In August 2021, EGMF also [contributed](#) to the Commission Roadmap on the upcoming Standardisation Strategy. Based on EGMF members' experience, we pointed out reflections on the governance of the standardisation system and on the international dimension of standards, while also providing specific suggestions for the future European Strategy.

## Competition legislation & e-commerce

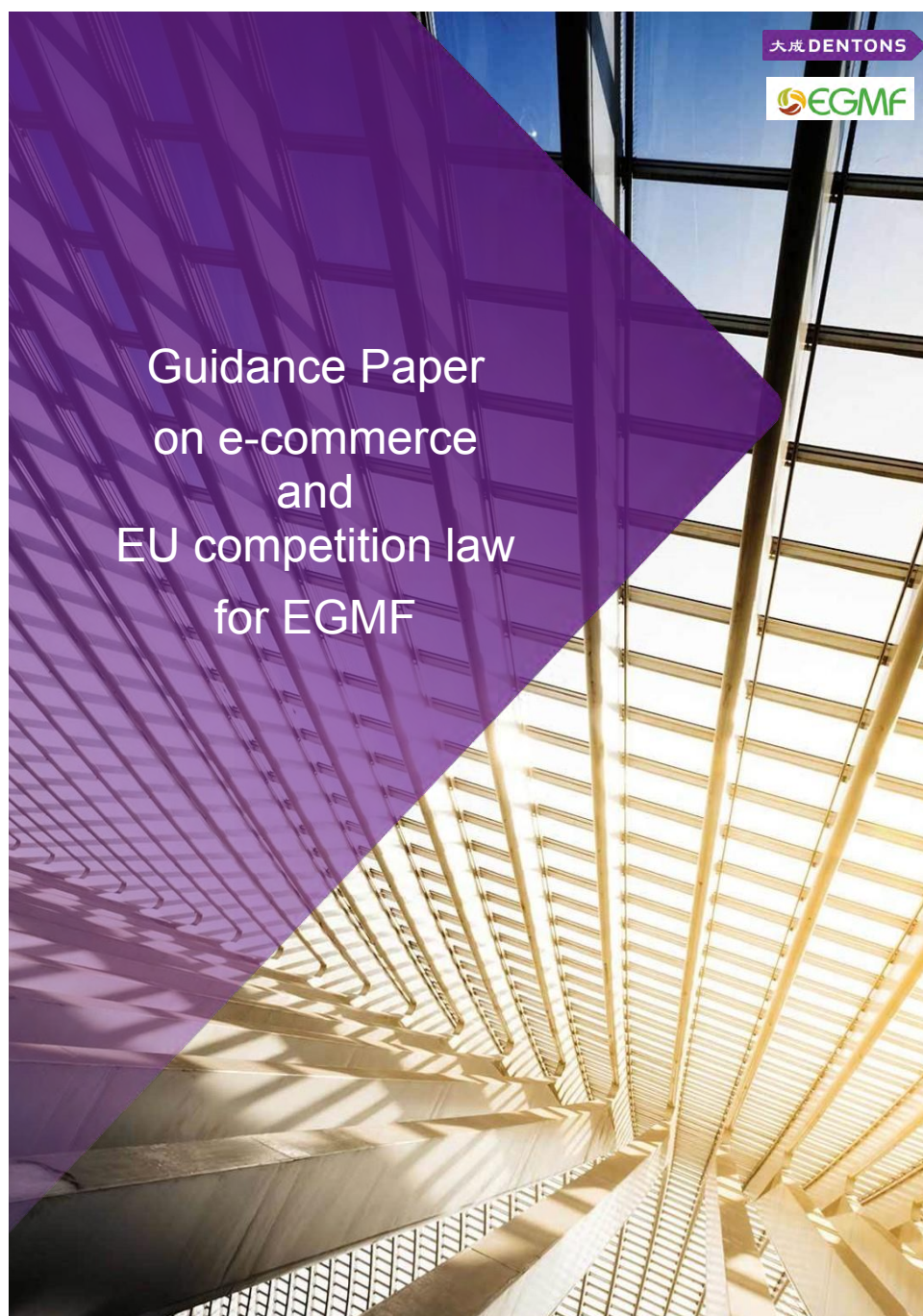
The development of multi-channel business and the booming of online sales during the Covid-19 pandemic is profoundly impacting our industry. Online sales are challenging well-established distribution practice through retail stores and dealers. Manufacturers also face uncertainties to define online channel distribution strategy in the light of a complex and evolving framework.

With the support of an external counsel, EGMF issued a Guidance Paper on 'e-commerce and EU competition law' in the autumn 2021. Tailored to our industry and its main distribution models, this Guidance Paper aimed to raise

members' awareness and shed light on the permissible and non-permissible practices that suppliers may explore when imposing measures to online resellers.

In addition, EGMF organised a dedicated webinar on 'e-commerce and EU competition law' for its members in September.

Since the legislative framework is permanently evolving, EGMF will continue working on this matter and will update the Guidance Paper once new EU rules on distribution agreements are adopted in spring 2022.



# List of Members

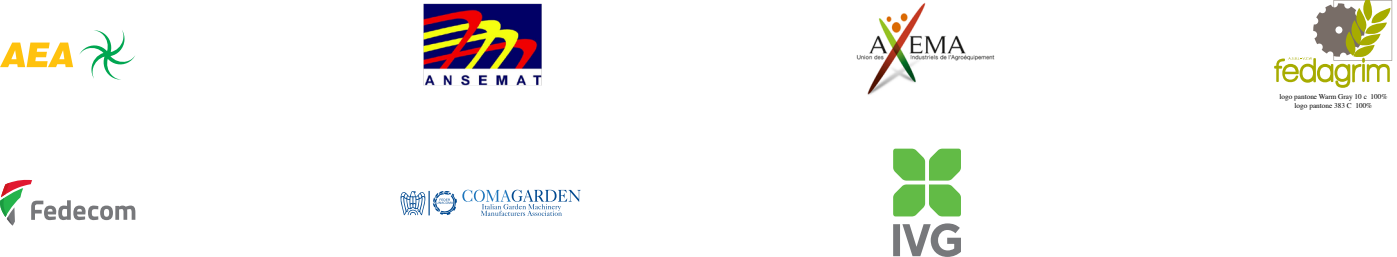
## Full Members Status October 2021

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## National Associations

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## Associate Members

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[www.egmf.org](http://www.egmf.org)

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