



2022 EGMF Activity Report





45th Anniversary 1977 - 2022

EGMF

in a nutshell

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

EGMF members share with households, municipalities, landscapers and greenkeepers the responsibility for green area maintenance which improves the quality of our lives.



To learn more and keep updated on all of our activities, visit our website, or follow us on LinkedIn and Twitter.



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

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President's Message

We are living in an extraordinary time, full of challenges and opportunities alike. Throughout 2022, we have faced a post pandemic world filled with geopolitical uncertainty, a challenging macroeconomic environment exhibiting itself primarily through the increasing energy costs, high inflation and continued supply chain disruptions.

I am proud to see how our industry and EGMF have responded to all of these challenges. We have quickly adapted to a new competitive landscape, embraced new ways of working and never stopped innovating. Our creativity and innovative spirit have made our industry even stronger.

We are witnessing further acceleration of 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 priorities for EGMF continues to be providing guidance to its members on e-commerce and competition law, shaping industry friendly regulations and bi-annual market surveys to help better understand trends in our industry, notably the rise of battery powered and autonomous products.

The EU's goal to be climate-neutral by 2050 is also our goal, and we are committed to do our part. We will work with EU institutions to develop a balanced regulatory framework that achieves this goal while preserving existing, and creating new, industry jobs and investing in new innovative technologies. At the same time, we are committed to vigorously defending the enforcement of rules protecting the European single market.

The events of the past few years have demonstrated the vital role that nature plays in our lives and our need to preserve it is greater than ever before. Without any doubt, a green and clean environment provides significant health benefits to citizens, and we are proud that our industry provides unique and innovative solutions to improve the "green infrastructure" for individuals and businesses alike.



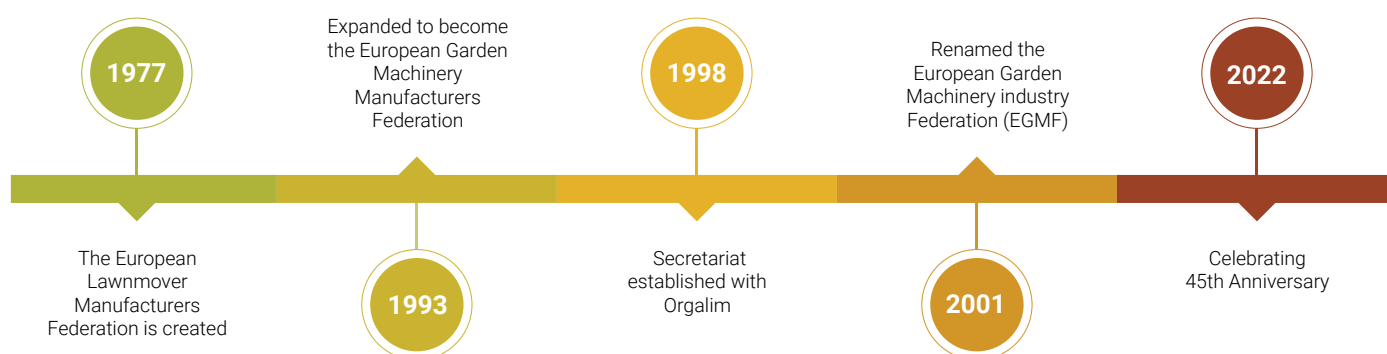
Rasto Nichta

EGMF President
2020 – 2022

I am very glad to report that while facing many challenges, our industry proved to be very resilient and reported near record results during 2021 - 2022 period.

Finally, 2022 marks the 45th anniversary of EGMF and the end of my mandate. It is now time to pass the baton to my successor who will continue to shape EGMF and our industry in the spirit of cooperation, a key element of success!

1977-2022: from lawnmowers to outdoor power equipment



In 2022, EGMF celebrated its 45th anniversary!

EGMF is an international not-for-profit association established in Brussels. Since creation in 1977, our name, scope and activities have evolved over the past 45 years.

Back in 1977, the association was called the European Lawnmower Manufacturers Federation. Main members included European manufacturers of lawnmowers and grass cutting equipment for domestic, recreational and municipal use. Membership also included national associations representing these manufacturers in Germany and the United Kingdom.

Initially, our association aimed to produce technical documents in the fields of safety, noise, environmental impact and performance. In the spirit of the European single market, the association worked in close cooperation with the European Commission on the preparation of legislation allowing the free circulation

and use of lawnmowers and garden equipment in the European Union.

Around fifteen years after its creation, EGMF expanded from lawnmowers to garden machinery, becoming the European Garden machinery Manufacturers Federation in 1993, EGMF for short. Again in 2001, the association was renamed the European Garden Machinery industry Federation to reflect the growing and evolving industry.

In 1998, with a view to improving contact and the relationship with the European institutions and decision-makers in Brussels, we established a general secretariat with Orgalim, the European Federation representing Europe's technology industries. To further increase activity and representation, EGMF is also a member of Orgalim.

Today, EGMF represents more than basic garden equipment, welcoming manufacturers of garden, landscaping, forestry and turf maintenance equipment.

EGMF Mission

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

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

We continue to welcome new members in the aim to further reinforce representativeness, strength and expertise.

New member

In 2022, Kärcher joined EGMF.

KÄRCHER Founded in 1935
in Germany, Alfred
Kärcher SE&Co.

KG is the world's leading provider of cleaning technology. Today, this family-owned enterprise employs 14.400 people in 80 countries and 150 subsidiaries.

Together, we go further

At EGMF, we fully believe in unity and cooperation. Sharing knowledge, experience and connections is at the core of our strategy and are key elements of our success.

First, the seven **National Associations**, which are members of EGMF, are the voice of our industry at national level. Besides offering a national platform for both large and small companies in our sector, they are the main contact point for national authorities and standardisation bodies.

In addition, we join forces with other **European associations** on a regular basis. Building on very successful experiences in previous years, our close collaboration with fellow organisations in the non-road mobile machinery sector and the mechanical industry makes us stronger when facing regulatory challenges.

We bring together:



31 companies

(27 full members and 4 associate members)



7 national associations

More than 50.000 service centres in all countries ensure continuous and comprehensive supplies to customers all over the world.

In past years, EGMF has also engaged in ad-hoc coalitions and wider industry platforms, such as the Umbrella Project on RoHS exemptions and the "BatteriesTransport" initiative.

At **international level**, we maintain a very close relationship with our US counterpart, namely OPEI – the Outdoor Power Equipment institute. These regular contacts help to share expertise on the respective markets and better understand regulatory challenges our industry faces 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

For the second consecutive year, 2021 was a record year for the outdoor power equipment market in Europe.

In 2021, our 27 corporate members sold almost 23.6 million units on the European Market (39 countries) compared to 19.4 million units in 2020.

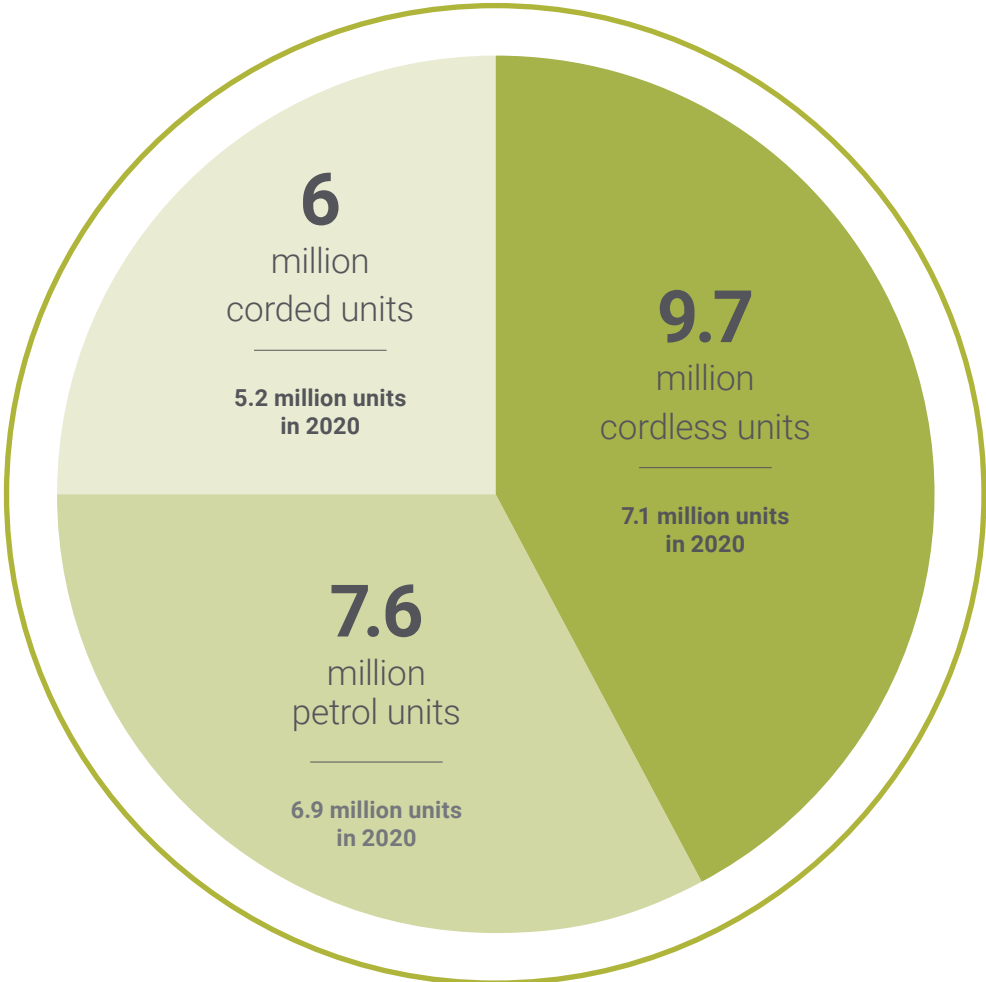
In 2021, the garden machinery and outdoor power equipment sector largely benefited from the 'cocooning effect'. The Covid-19 pandemic and the lockdown relaunched homeowners' connection to their living landscape and enhanced investment in their garden. Although this investment trend in outdoor spaces remained in 2022, it is slowing down.

In addition, the weather conditions in 2021 were favourable for the growth of grass, plants, and trees, and strengthened the demand for garden machinery. Being intrinsically linked to natural cycles, green area maintenance operates according to seasons.

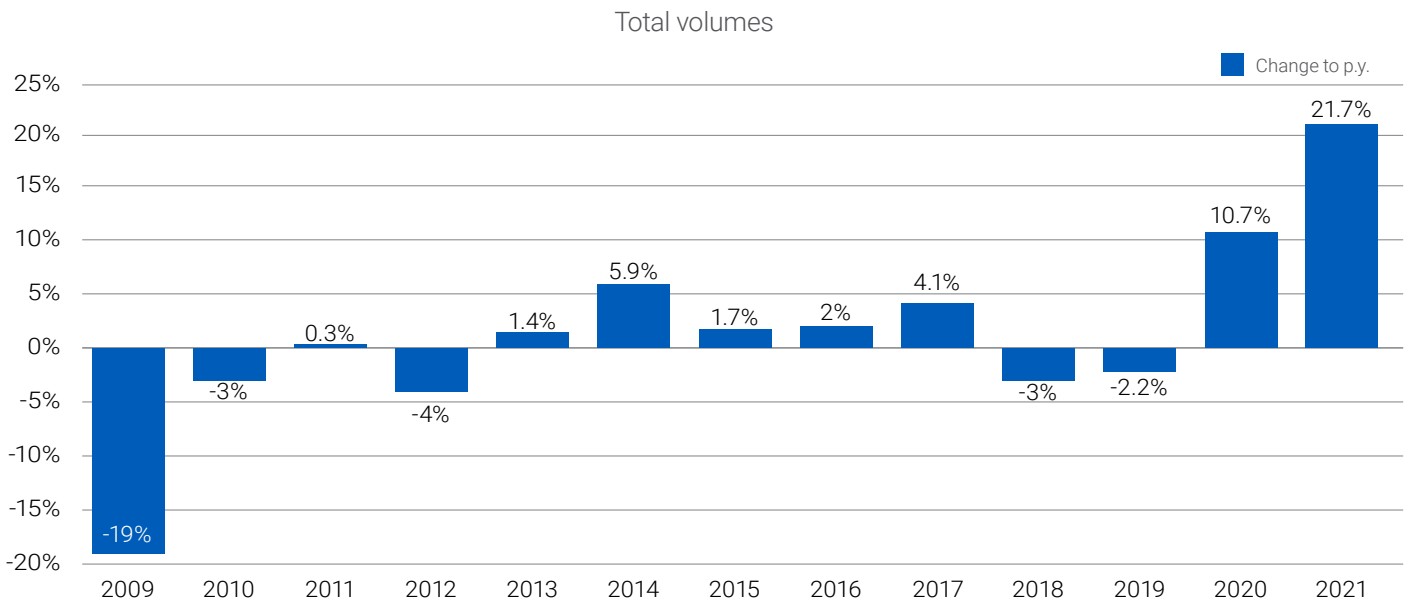
Although 2021 has broken growth records in countries that were the most affected by the pandemic, sales increased for all types of outdoor power equipment and all types of power source, in each and every European region.

Finally, the EGMF market surveys confirmed the shift towards battery powered equipment. Driven by innovation and consumer demand, this shift is enhancing the electrification of our industry.

2021

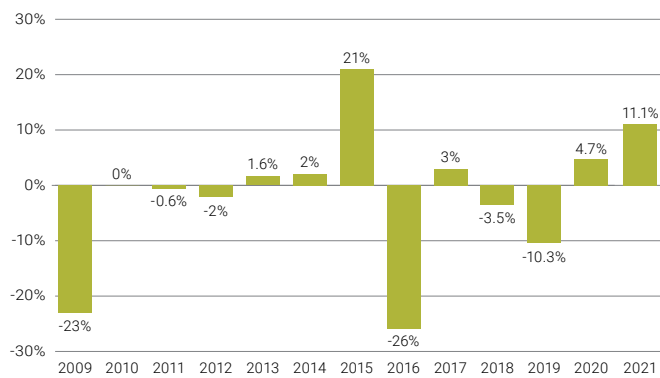


Year-by-year evolution

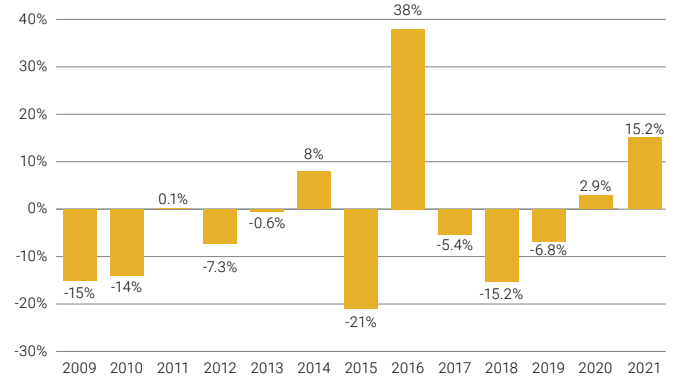


Volumes per type of power source

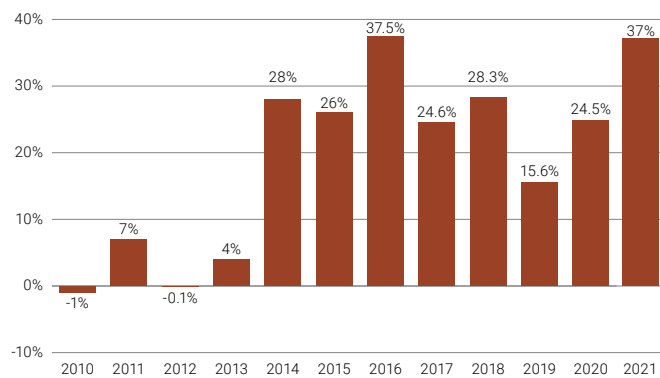
Petrol



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 Aragonés (John Deere)



Franco Bastasin (Stiga)



Marcel Berben (Briggs & Stratton)



Jonathan Broome (MTD / Stanley Black & Decker)



Rudolf Harrer (Honda)



Gary King (Bosch Lawn & Garden)



Thomas Meyer (Etesia)



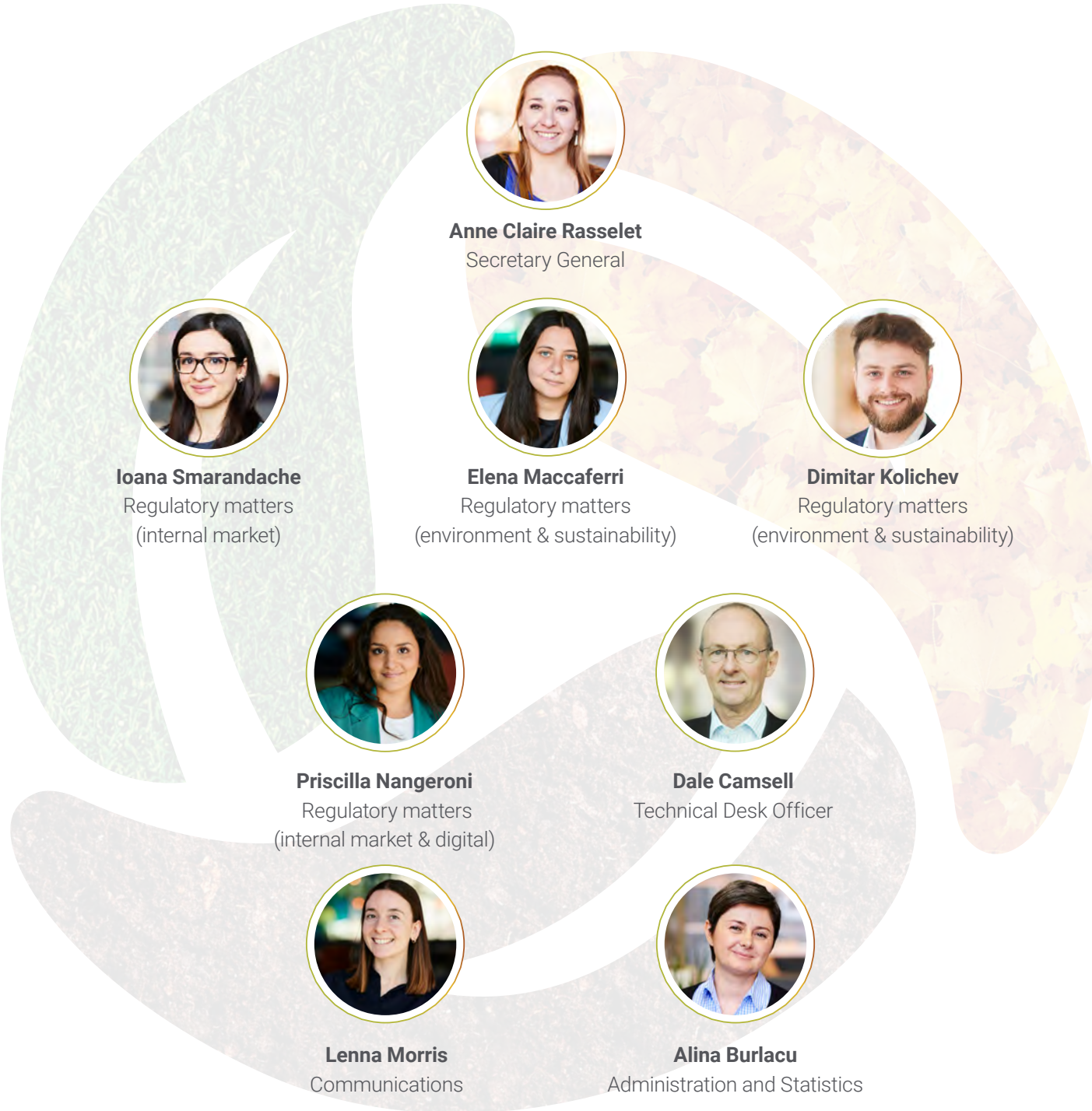
Wolfgang Simmer (Stihl)

Working bodies

The Technical and Marketing Committees are driving the 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 Secretariat. Based in Brussels, the team manages the market surveys and engagement with the EU institutions, thus supporting EGMF outreach.



Anne Claire Rasselet
Secretary General

Ioana Smarandache
Regulatory matters
(internal market)

Elena Maccaferri
Regulatory matters
(environment & sustainability)

Dimitar Kolichev
Regulatory matters
(environment & sustainability)

Priscilla Nangeroni
Regulatory matters
(internal market & digital)

Dale Camsell
Technical Desk Officer

Lenna Morris
Communications

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

The EGMF market survey is an essential benefit for our members as this well-established indicator remains a key tool to understand main trends in the outdoor power equipment market.

In 2022, we adjusted the product segmentation and started data collection on new types of equipment, focussing mainly on battery driven equipment. These adaptations aim to better capture the electrification of our industry as the shift towards battery is driving the growth in our industry.

In addition, EGMF continued to be the spokesperson of the garden machinery and outdoor power equipment industry. Throughout the various advocacy activities, EGMF actively engaged with EU decision-makers.

The revision of the Machinery Directive, a key legislative pillar for equipment safety, and the Outdoor Noise Directive were our top priorities in 2022. Efforts have already paid off as several EGMF recommendations have been reflected in amendments tabled by EU legislators. In the coming months, we will pursue our collective efforts on these files.

In addition to this, sustainability continues to be a key focus, not only as a core value in our industry. 2022 has been marked by intense advocacy activities on future regulations related to batteries and circular economy, aiming to make sustainable products the norm in Europe.

Besides these priorities, EGMF provided early information on the EU legislative framework, through various channels,

to help members navigate the regulatory challenges and remain at the forefront of developments impacting products and companies. We organised a webinar to shed the light on new EU rules on distribution agreements. This also kicked off the revision of the related EGMF Guidance Paper.

As a special recognition this year, we celebrate the 45th anniversary of EGMF. As part of our objective to raise visibility, we strengthened our presence on social media and launched communication campaigns to shine the spotlight on our association, our members, and our industry.

Finally, 2022 offered the opportunity to renew face-to-face meetings and events, offering unique occasions to network and reconnect in person.




Anne Claire Rasselet
Secretary General

Our work in numbers



40+
Internal meetings of the
Technical and Marketing
Committees, including
task forces



2
Market surveys on 14
categories of equipment
and 39 countries



5
Information Bulletins



4
Newsletters




37
Positions adopted, including
letters, responses to
consultations and joint
statements with fellow
organisations



1
Guidance document
for our industry



60+
Posts on LinkedIn



2
Webinars and training
sessions

EGMF market surveys

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

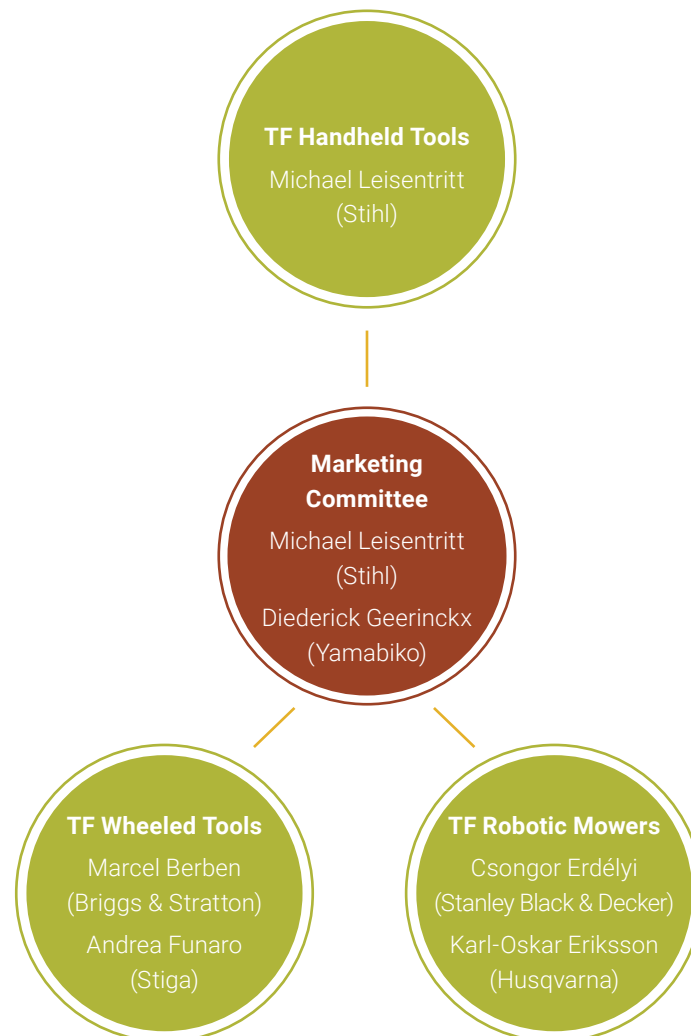
Our surveys cover fourteen equipment categories and 39 countries. Based on input from all corporate members, these bi-annual market surveys provide a well-established indicator for the garden and outdoor power equipment market in Europe.

Our Marketing Committee, composed of representatives from companies and national associations, oversees the development of these surveys. This Committee also keeps our statistical tools up-to-date, notably by adjusting the product segmentation to better capture market trends and increase granularity of the analysis.

In addition, we work on continuously improving our online statistical platform to facilitate the data collection process for members and improve the quality of surveys outcomes.

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 City of Paris who shed light on the procurement policy and expectations on product characteristics.

The Marketing Committee includes three task forces focusing on specific types of equipment: handheld tools, wheeled tools, and robotic mowers.



EGMF regulatory and advocacy activities

The regulatory environment is permanently evolving and previous months were no exception. Therefore, regulatory matters remain an important part of EGMF activities.

Regulatory and technical activities are driven by the Technical Committee, which is composed of 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.



1. Internal market

Ensuring garden machinery is safe when placed on the European single market has always been a core objective. EGMF and its members pay close attention to machine safety, noise and exhaust emissions, as well as electrical safety to complete the puzzle of overall product safety.

The permanently evolving and ever more demanding regulations on product safety form a big part of EGMF's policy activities. For years, EGMF has called for a coherent and reliable regulatory framework that provides the necessary predictability, while leaving enough room for innovation. In addition, EGMF has advocated for more effective and coordinated market surveillance to achieve a robust and well-functioning single market.

Over the past year, the revision of the Machinery and Outdoor Noise Directives have been top priorities amongst the many internal market issues.

Machinery legislation

The Machinery Directive is a core legislative pillar for the garden and outdoor power industry. Over past decades, it has addressed emerging technologies and guarantees a high level of safety for all machines used by European citizens throughout the EU.

In April 2021, the European Commission published its proposal for a Machinery Products Regulation. Since then, EGMF and its members have actively engaged with decision-makers in the European Parliament and the Council to contribute to the debate. In particular, the EGMF Machinery Task Force has met no less than eight times in order to elaborate EGMF priorities and formulate a series of recommendations to be shared with EU institutions. We voiced our concerns on several issues, notably the reference to "high risk" machinery and mandatory third-party certification, the definition of safety function and the obligation of a mandatory supervisory control function for autonomous robots.

While these efforts have already paid off, in the coming months, EGMF will continue its advocacy work, targeting EU regulators who are involved in triilogue negotiations. A final agreement is expected by the end of 2022.

Outdoor Noise Directive

As the European Commission resumed its work on the revision of the Outdoor Noise Directive, this remains a priority issue for EGMF. In 2022, the work focused on the update of measurement methods according to state-of-the-art standards.

EGMF continued cooperation with the European Commission, participating in several meetings of the dedicated Expert Group. In addition to analysing the various versions of the draft legislation, EGMF voiced members' view in the meetings. We also provided several

recommendations and proposals for content, with many included in the final draft proposal of the Commission. Notably, one of the achievements was the confirmation that robotic mowers are excluded from the scope of the current directive.

EGMF will continue to engage with the European Commission on this key legislation, notably in participating to the public consultation. The final Delegated Act amending noise measurement methods is expected in the first half of 2023.

Road circulation

EGMF aims to deepen the EU single market and reduce administrative burden for 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. In past months, EGMF reiterated its call for a future EU Regulation and contributed to the preparation of the legislative proposal, which is now expected in early 2023.

In June, EGMF participated in a workshop on Road Circulation, organised by the European Commission, and provided written feedback on open aspects. The future regulation will follow a simplified type-approval legislation, taking inspiration from the Tractor Mother Regulation. However, the technical documents provided by the Industry Task Force (ITF) will be used to set up specific technical requirements to be dealt in Delegated Acts.

Once the Commission publishes its proposal, EGMF will analyse the proposed legislation and then engage with EU decision-makers throughout the legislative process.

2. Digitalisation

EGMF's focus within EU digital policy has predominantly been the proposal for an Artificial Intelligence (AI) Act.

In 2022 the main task of the EGMF Working Group on Artificial Intelligence and Cybersecurity was to analyse the Council and European Parliament amendments on the AI proposal and identify any potential impact. We welcomed the decoupling of the future AI Regulation from the future Machinery Regulation.

In addition, EGMF has co-signed a joint statement with eleven fellow organisations calling EU legislators to respect principles of the New Legislative Framework (NLF) in the AI Act. We aimed to ensure coherency with the product-specific legislation.

In the coming months, EGMF will continue to closely monitor the developments on the Artificial Intelligence Act and two additional proposals tabled in 2022: the Cyber Resilience Act and AI Liability Directive.

3. Sustainability

As an industry close to nature, sustainability is at core of the strategy and values of our members, and therefore a priority for EGMF. Manufacturers are continuously striving to develop technological solutions to maintain green areas not only efficiently, but also with a minimum impact on the environment.

Today, EGMF and its members strongly support the green transition and the ambition to make sustainable products the norm in the EU. In the context of an ever more demanding framework, regulating products from the design phase through to daily use and end-of-life, we firmly believe that consumers' safety should not be compromised.

In line with the European Green Deal, sustainability will continue to rank high on EGMF's agenda. We will continue calling for a legislative framework enhancing innovation – an essential element for the EU competitiveness and sustainable growth agenda.

Batteries Regulation

Considering the electrification trend in our sector, the future Regulation on batteries and waste batteries will influence the future of our industry. Since the publication of the European Commission's proposal in 2020, EGMF has closely monitored the legislative process.

In 2022, EGMF continued its advocacy work and outreach towards EU decision-makers in the European Parliament and the Council to achieve a balanced regulation.

In January, EGMF issued comments and recommendations to influence the drafting of compromise amendments in the respective EU institutions. Then, further to the positions adopted in

March by the European Parliament and the Council, EGMF issued another set of recommendations in view of the triilogue negotiations between EU institutions.

In parallel, we joined forces with EPTA - the European Power Tools Association - to build common advocacy tools on specific issues, such as common chargers.

In the coming months, EGMF will continue to closely follow the final steps of legislative process, which is expected to be finalised in 2023.

Transport of batteries

In 2022, EGMF participated in the "BatteriesTransport" initiative. This joint industry platform aims to enhance compliance with international legislation and safety for the transport of batteries, including when integrated into equipment.

As a supporter of this initiative, EGMF members benefit from additional features such as access to an extended version of the guidelines for transport of batteries and to webinars highlighting the latest legislative changes.

Circular Economy Packages and Sustainable Products

EGMF closely monitored and engaged in several initiatives as part of the new EU Circular Economy Action Plan. Besides our own actions, we actively engaged in the dedicated working group in Orgalim.

Our focus has been on the preparation and then the analysis of the first Circular Economy Package that the European Commission published in March 2022. It notably included a proposal to increase the sustainability of products, called "Ecodesign for Sustainable Products Regulation (ESPR)" and a new proposal called "Empowering the consumer for the green transition".

Collaborating with EPTA, EGMF participated in the European Commission's final consultation on the future ESPR and issued a joint position paper. While we support the principles of the Regulation, we raised concerns on the new Digital Product Passport and called on decision-makers to refrain from regulating chemicals in this new legislative framework. In addition to our recommendations, we also shared concrete amendment proposals with decision-makers as part of our lobbying activities.

Regarding the new initiative aimed at empowering consumers, EGMF produced a short position paper that welcomed the unified approach at European level and called for educational measures.

In 2022, we also responded to the Commission's public consultation on the "Right to repair" and issued specific recommendations for the preparation of the legislative proposal.

In the coming months, we will continue our work on the future regulation on sustainable products and new proposals to be tabled in a second Circular Economy Package.

Ecodesign and Energy Labelling

In 2022, previous EGMF advocacy work to keep interoperable batteries as a voluntary initiative paid off! In line with EGMF's request, universal/interoperable batteries were not listed in the final Ecodesign & Energy Labelling Working Plan 2022-2024 published by the European Commission in spring 2022.

The disbanding of a possible energy labelling on high pressure cleaners was also confirmed. A decision that was welcomed by EGMF.

In addition, we closely followed the revision of the current Ecodesign measures on external power supplies and industrial fans (fans driven by motors) which could potentially affect garden machinery through their scope extension. We will continue monitoring further developments in the coming months.

REACH Regulation

EGMF has been working on the revision of the REACH Regulation, for which a legislative proposal is scheduled for late 2023. In the past months, EGMF responded to the public consultation and called on the European Commission to avoid any administrative burden.

We also closely followed several authorisation and restriction processes. First, EGMF worked on a proposal to include lead in the REACH Authorisation List. Lead is an essential and irreplaceable substance for numerous specific applications in the manufacturing of garden and outdoor power equipment, including lead-based batteries, with no substitute readily available. Therefore, EGMF submitted comments during the public consultation.

In addition, EGMF worked on the draft restriction proposal of Dechlorane Plus. These substances are used for various applications in our industry, due to their flame retardance and seizure resistance properties. EGMF therefore responded to the public consultation and provided comments, putting forward the critical need of these substances to guarantee the durability and safety of our equipment.

RoHS Directive

EGMF is working on the upcoming revision of the RoHS Directive in parallel the renewal of exemptions as this directive applies to most garden machinery.

First, EGMF contributed to the preparation of the RoHS Directive review. EGMF responded to the two public consultations in 2022 and suggested simplifying and clarifying the RoHS Directive. Regarding possible options for the RoHS review, we are firmly opposed to the incorporation of this directive into another piece of legislation.

In February, EGMF also co-signed the position paper of the Umbrella Project, a cross industry platform, on the revision. The industry calls on the Commission to avoid a too burdensome and too bureaucratic legislative framework without obvious additional environmental, health and consumer benefits.

In addition, EGMF has been closely following the renewal of exemptions beyond 2021 through the Umbrella Project.

In the coming months, EGMF will continue working on both the renewal of exemptions and RoHS revision, for which a legislative proposal is scheduled for 2023 or 2024.

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 members pay full attention to the correct interpretation of EU product legislation, in line with the New Legislative Framework (NLF) and its core elements.

Therefore, EGMF contributed to the European Commission's evaluation of the New Legislative Framework in participating to two stakeholders' consultations and an ad-hoc workshop last spring. We also exchanged views with the external consultant in charge of the evaluation study at the spring Technical Committee meeting.

In addition, EGMF welcomed the publication of the revised 'Blue Guide on the implementation of the product rules 2022', on which we were actively involved in 2021. The Blue Guide addresses to some extent new concepts such as "substantial modifications" at the core of the digital and circular economy. However, EGMF raised concerns about the varying formulation of such concepts in series of recent legislative proposals addressing machine safety.

Finally, EGMF will continue to monitor closely the implementation of Regulation (EU) 2019/1020 on Market Surveillance and Compliance, aware of the difficulty for Market surveillance authorities to control non-compliant products that create unfair competition to the lawful manufacturers of garden machinery.

5. Trade and market access

As an 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.

In 2022, EGMF co-signed a joint statement, together with 24 fellow organisations, urging the EU institutions to continue to make EU trade agreements a priority, opening new markets for trade and investment.

In addition to this, we fully support continuously deepening the single market, notably through standards.

Therefore, the EU standardisation system is of core importance, not only at members' level through their involvement in relevant national, European, and international standardisation organisations, but also at strategic level. EGMF has always advocated for an EU political vision that supports industry needs.

Standardisation policy

This past year, EGMF has been very active on standardisation issues. Members carefully analysed the possible impact of the European Commission's standardisation strategy, published in February, and its proposal to amend Standardisation Regulation.

As a result, EGMF co-signed a joint industry statement in April, welcoming the ambition of the strategy. The joint statement also included a series of recommendations to consolidate the strengths of the existing system and consequently preserve the inclusive and successful market-driven nature of the standardisation processes.

Following this statement, EGMF also participated in a roundtable with the Commission and industry on standards, called SMARRT meetings.

In 2023, EGMF will continue to follow developments closely, with a view to participating in the future High-Level Forum and the evaluation of the European Standardisation Regulation

Competition legislation & e-commerce

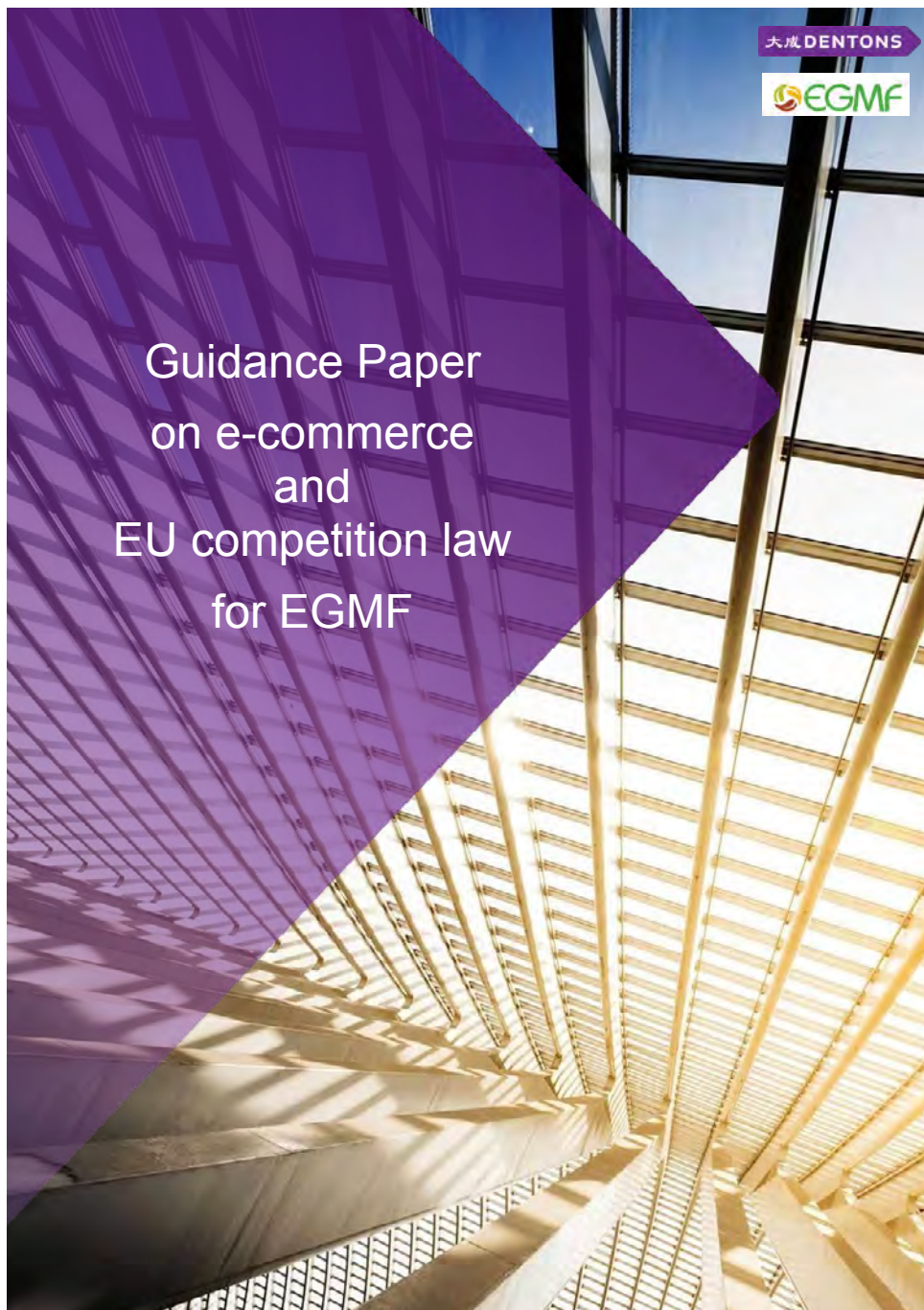
The development of multi-channel business and online sales are challenging well-established distribution practices in our industry. Manufacturers also face uncertainties to define online channel distribution strategy in the light of a complex and evolving regulatory framework.

In June 2022, EGMF organised a webinar: “Key reforms introduced by the European Commission on EU rules for distribution and agency agreements”, open to its members only. This webinar aimed to present key reforms introduced by the European Commission in the revised

Vertical Block Exemption Regulation (VBER) and its associated guidelines, which were published in spring.

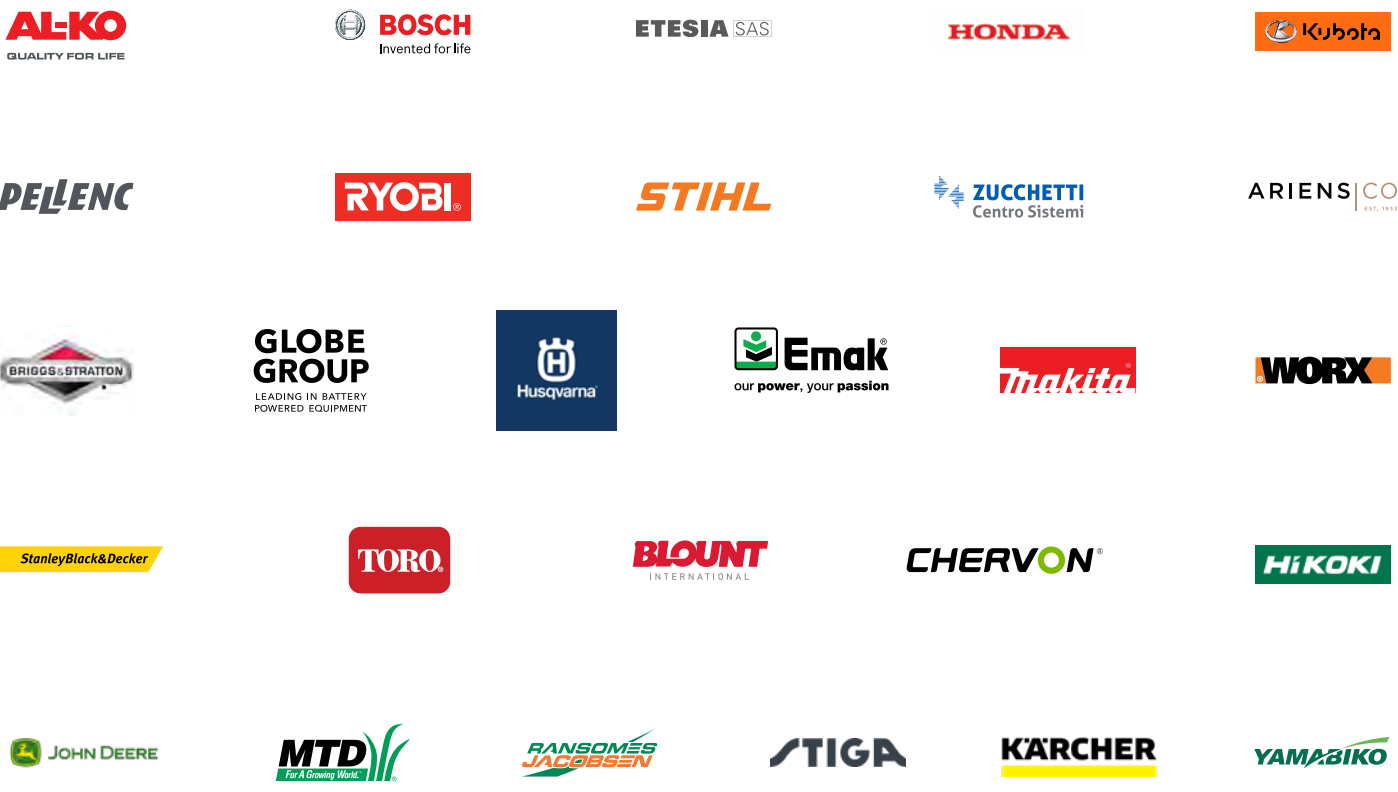
In addition, these new EU rules on distribution and agency agreements triggered the revision of the EGMF Guidance “E-commerce and competition law”, with the support of an external counsel.

Tailored to our industry, our revised Guidance Paper aims to raise members’ awareness and shed light on the permissible and non-permissible practices that suppliers may explore when imposing measures to online resellers.



List of Members

Full Members Status November 2022



National Associations



Associate Members





www.egmf.org

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