



2023 Activity Report



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](https://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



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twitter.com/EgmfEu

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President's Message

As we, as industry, reflect on the past year, we still find ourselves in an evolving landscape that continues to pose both challenges and opportunities. The echoes of the previous year resonate through 2023, revealing a world emerging from the shadow of a global pandemic. The garden industry is experiencing a gradual return to normalcy in terms of demand and seasonality. We see some reassuring signs of resilience but clearly a lot of our members feel some pressure.

However, the broader macroeconomic environment remains to be a canvas full of question marks. Despite the passage of time, the war in Ukraine persists, casting a shadow on the geopolitical horizon, contributing to remaining uncertainties.

The long-lasting strength of EGMF stands for stability and growth in such uncertain times. EGMF has during past years drawn interest from many companies, each eager to contribute to our collective mission. This interest and engagement is a testament to the enduring relevance and vitality of EGMF in fostering industry collaboration.

In the spirit of continuous improvement, the findings from the satisfaction survey that we conducted are another indication of our commitment to listening and adapting. The results were very encouraging, and this exercise empowers us to align our strategies to the needs and expectations of our stakeholders, fostering a deeper and more meaningful connection.

Recognising the importance of collaboration and leadership, we extend our sincere appreciation to Michael Leisenstritt for his steadfast commitment heading up the Marketing Committee for many years and we are grateful to Marcel Berben who has taken the helm of the Marketing Committee, steering its efforts towards innovation and progress.

The invaluable contributions of the Marketing and Technical Committees are pivotal to our accomplishments. We express our gratitude to every individual who has lent their expertise and dedication to these endeavours. As we progress, we are determined to expand further the involvement of as many members as possible, ensuring that more members are integral to these vital functions.

One key achievement of 2023 is the launch of the updated version of the EGMF Guidance Paper on e-commerce and competition legislation. This milestone underscores our dedication to creating a regulatory landscape that supports fair competition while embracing the digital development in our industry.

Financially, EGMF remains robust with another year of solid performance that anchors us in a position of strength. This achievement reflects the collective efforts of our members and partners who have consistently pushed boundaries and explored new horizons.

At the same time, our journey continues with the ongoing development of a new website. This promises to strengthen

engagement and facilitate knowledge exchange, ultimately enhancing the value we provide to our members.

Following the commitments from the previous year, our industry remains dedicated to embracing transformative trends such as electrification, digitalisation, and e-commerce. These endeavours resonate well with our commitment to shaping industry-friendly regulations, offering guidance on pertinent matters, and giving market insights through our bi-annual market surveys.

The imperative of the European Union's vision for climate neutrality by 2050 is in line with these initiatives. We are fully aligned with this goal, pledging our efforts to forge a balanced regulatory framework that not only advances environmental stewardship but also safeguards jobs and fosters innovation.

The past few years have highlighted the important role that nature plays in our lives. Our industry's dedication to enhancing the 'green infrastructure' resonates as a profound commitment to our environment's well-being, offering innovative solutions that gives our customers a better life.

As President of EGMF, I am proud of our collective achievements. I would like to thank all members for their contribution during the year, with a special thanks to my colleagues in the Board whose contribution is key for EGMF. Together, we shape the trajectory of our industry and stand united in our commitment to progress.

With gratitude and anticipation,



Andreas Rangert

EGMF President
2022 – 2024

EGMF Footprint

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

We bring together:



30 compagnies

(26 full members and 4 associate members)



**7 national
associations**

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.

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

After two consecutive record years, the European outdoor power equipment market shrank in 2022. Last year, our 26 corporate members sold 20.6 million units on the European Market (39 countries) compared to 23.6 million units in 2021. Four main factors can explain the setback.

1. The post-COVID need to reconnect to nature (cocooning) that generated increased investment in garden equipment, came to an end. Consumers changed their behaviour in 2022, going back to more "normal" purchasing rhythms.

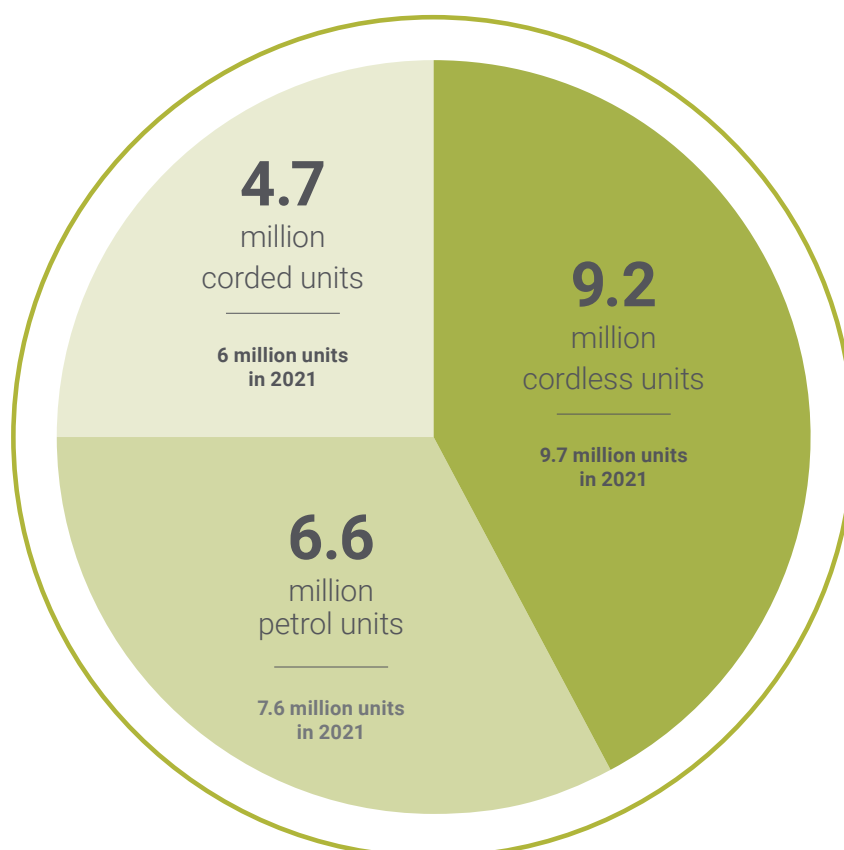
2. The weather conditions were very different, with heavy droughts all over Europe throughout the spring/summer period. With less growth of grass, plants, and trees, came less maintenance needs and consequently less demand for garden machinery.

3. The economic downturn, steep inflation and the war in Ukraine were combining factors that negatively impacted on sales. That was particularly clear with an accelerated drop in the second half of 2022.

4. Supply issues with electronic components (cells and processors) resulted in very late sell-in of various categories (battery tools and robotic mowers) into the distribution, but without sell-out. This resulted in heavier stock at distributor and dealer level, which, in turn, resulted in lower forecast for other product categories than in a normal year.

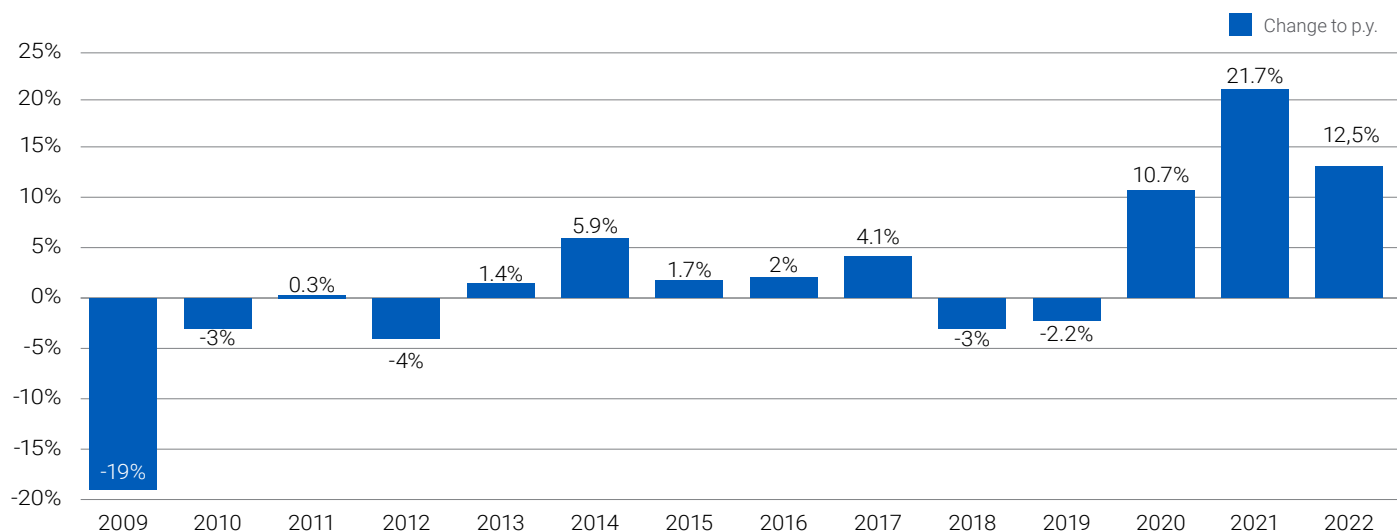
Finally, it should be noted that despite this change on the market, the shift towards cordless - battery powered – equipment continued in 2022.

2022



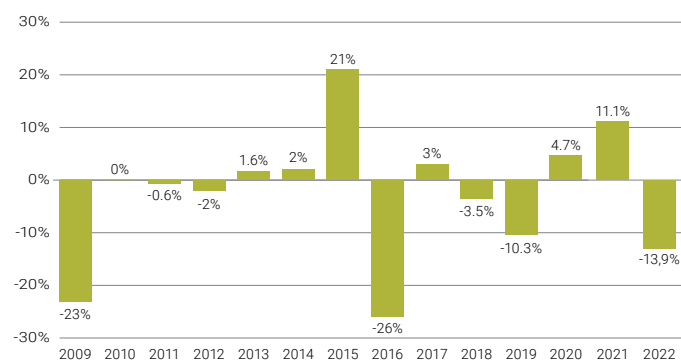
Year-by-year evolution

Total volumes

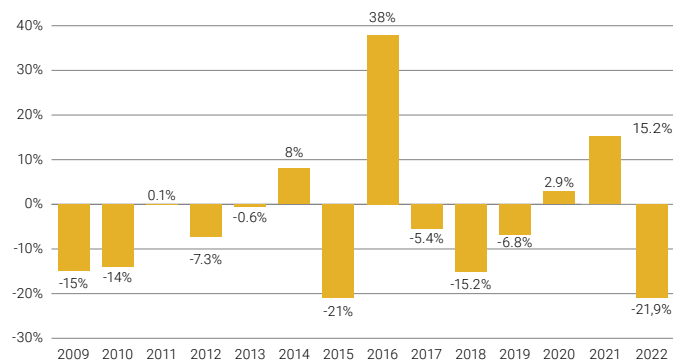


Volumes per type of power source

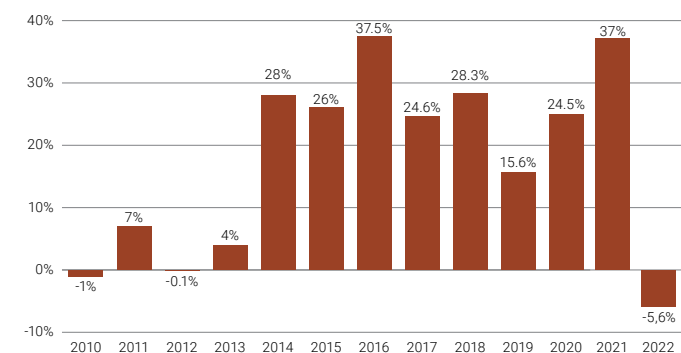
Petrol



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 2022-2024



Andreas Rangert
President (Husqvarna)



Thomas Meyer
Vice-President (Etesia)



Anthony Nadalin (Toro)



Carlos Aragones (John Deere)



Franco Bastasin (Stiga)



Marcel Berben (Briggs & Stratton)



Jonathan Broome (MTD / Stanley Black & Decker)



Rudolf Harrer (Honda)



Gary King (Bosch Lawn & Garden)



Wolfgang Simmer (Stihl)

Working bodies

The Technical and Marketing Committees are driving EGMF's 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 outreach.



Anne Claire Rasselet
Secretary General



Ioana Smarandache
Regulatory matters
(internal market)



Dimitar Kolichev
Regulatory matters
(environment & sustainability)



Priscilla Nangeroni
Regulatory matters
(internal market & digital)



Dale Camsell
Technical Desk Officer



Lenna Morris
Communications



Paulina Forsys
Statistics



Emma Patrali
Administration

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

Given the intensity of the EU legislative agenda, advocacy work represented a large part of EGMF's activity last year. Although a number of legislative processes are not yet closed, we have already started reaping the benefits of our efforts. This is the case with the new Machinery Regulation, which includes provisions on digital instructions and where EGMF, together with other machinery sectors, has been successful in limiting third party certification. Likewise, we are expecting the exclusion of robotic mowers in the Outdoor Noise Directive's scope and all our recommendations on updated and new standards seem to have been taken on board in the upcoming Delegated Act on noise measurement methods.

With legislative activity expected to intensify in the run-up to the EU elections, we are not relaxing our efforts to continue producing positive regulatory outcomes for our companies.

Meanwhile, we are constantly improving EGMF's statistics. Further adjustments to product categories have been made to better capture the characteristics of a constantly evolving market. It is with the same spirit that the geographical division was adapted, and notably regional clusters.

Delivering on a clear request from members in the satisfaction survey undertaken early 2023, we have also managed to achieve a quicker turnaround for our market survey by addressing late reporting upfront and

by increasing our analytical efficiency. We aim at getting even faster next time round.

Finally, we have increased our communication efforts to communicate better and more about EGMF, our members and our industry. With this in mind, we launched a "meet our members" campaign, which consists of interviews aimed at shining a spotlight on our members, what has inspired them to join EGMF and where they see the future of the garden machinery industry heading.



Anne Claire Rasselet

Secretary General

Our work in numbers



42+

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



2

Market surveys on 14
categories of equipment
and 39 countries



4

Information Bulletins



3

Newsletters



23

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



30+

Posts on LinkedIn

EGMF market surveys

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

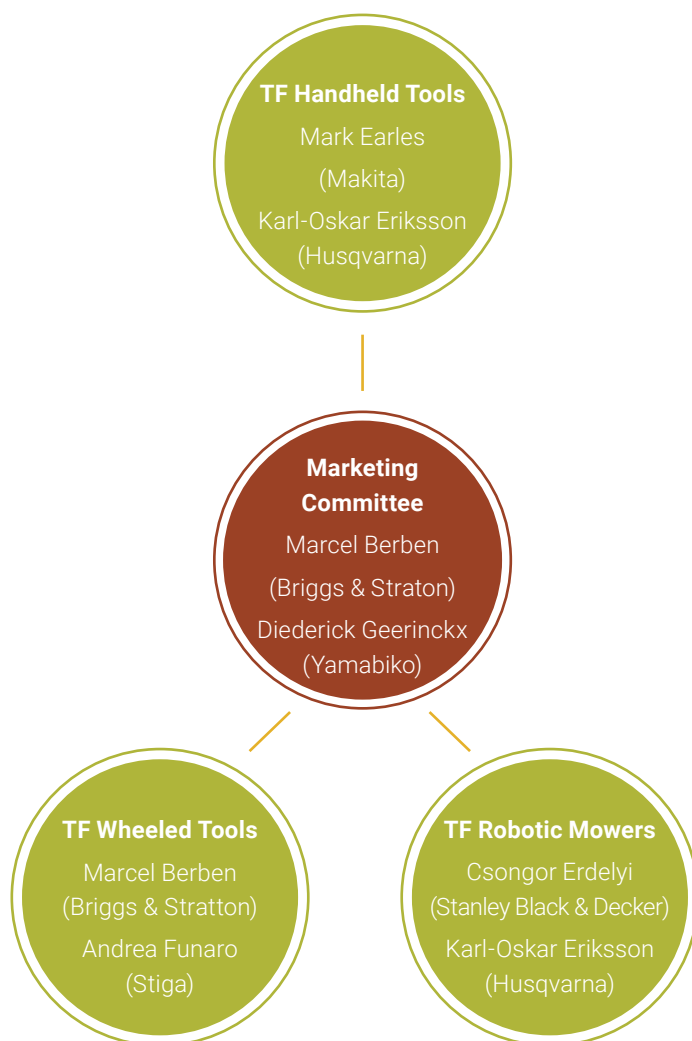
Our surveys cover 14 equipment categories and 39 countries. Based on input from all corporate members, these bi-annual market surveys provide a well-established indicator for the garden and outdoor power equipment market in Europe.

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 survey outcomes.

The Marketing Committee also acts as a forum, offering a platform to discuss trends in the green area maintenance sector.

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's activities.

Regulatory and technical 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.



1. Internal market

The EU's Internal Market remains an important pillar in EGMF's core regulatory work. EGMF completed its successful advocacy campaign on the Machinery Regulation at the end of 2022 and is currently focusing on the next phase of implementation.

We also remained active on the revision of Annex III (measurement methods) of the Outdoor Noise Directive and began advocacy work on the new proposal harmonising road circulation requirements for mobile machinery.

Machinery legislation

The EGMF Machinery Task Force continued its outreach on the Machinery Regulation during the inter-institutional negotiations (trilogue meeting) that were concluded in December 2022.

The provisional agreement reached by the European Parliament and the Council at the last trilogue meeting reflected mostly positive outcomes for EGMF. The [Machinery Regulation 2023/1230](#) was then published on 29 June 2023 in the EU Official Journal (with a subsequent [corrigendum](#) on 4 July).

One of the key advocacy wins is the explicit permission of digital documentation (instructions, declaration of conformity) in the Regulation. While the basic safety information needs to be delivered on paper for non-professional equipment, the full instruction manual may be provided by digital means. This is a major step forward that will bring considerable economic and environmental benefits.

EGMF also managed to convince policymakers to include portable chainsaws in part B of Annex I (on so-called 'high-risk machinery') which allows them to continue using the self-assessment procedure provided that the relevant harmonised standards have been applied. Finally, the implementation date was extended to 42 months after the entry into force of the Machinery Regulation, being set on 20 January 2027. This is one year later than what the Commission had initially proposed, and in line with the requests of various industry stakeholders, including EGMF.

From January 2023, the Machinery Regulation Task Force has had regular virtual meetings to analyse the final text of the Regulation and identify key issues that require clarification either in future application guidelines and/or in product specific standards.

In the coming months, EGMF will closely cooperate with the European Commission on the content of the future guidelines and will make contributions to specific issues for the EGMF sector. This includes essential safety information for non-professional machinery in digital and paper format.

Outdoor Noise Directive

As the European Commission approaches the final revision of Annex III of the Outdoor Noise Directive, EGMF continues to play a crucial role in drafting the upcoming Delegated Act, which will update measurement methods in line with state-of-the-art standards.

EGMF maintained its cooperation with the European Commission by actively participating in the [public consultation](#) launched in June, following the publication of the [last draft of the revised Annex III](#). This latest revision incorporated several of EGMF's previous recommendations, including the exclusion of robotic mowers and updates to a number of standards related to EGMF equipment. However, certain issues, such as the transition period, remained unresolved. In the context of the above-mentioned public consultation and in a later updated paper, EGMF reiterated and brought these concerns to the attention of the European Commission.

EGMF is currently awaiting the final version of the revised Annex III, which was initially expected to be published in the summer of 2023. However, there have been delays and EGMF will continue monitoring every development on this matter.

Road circulation

In March, EGMF welcomed the long-awaited European Commission's proposal for a [Regulation on the EU approval of non-road mobile machinery](#) through a welcoming statement.

Since then, the EGMF Road Circulation Task Force met to work on a position paper, finalised on 26 May, in which EGMF expresses its position and brings forward recommendations to the European Parliament and Council on how to improve the European Commission's legislative text.

Moreover, EGMF was closely involved with TRL/Fka, the two private contractors employed by the European Commission, to develop a study on the technical requirements related to this file. EGMF participated in two workshops organised throughout the year, and had a bilateral meeting with them, during which EGMF's input on technical requirements was heard and discussed. EGMF also provided written feedback to the public consultation opened by the same private contractors in July.

EGMF is following the developments on this file and regularly cooperating with the other ITF (Industry Task Force) members.

2. Digitalisation

EGMF's focus within EU digital policy has predominantly been the proposal for a Cyber Resilience Act.

The main task of the EGMF Working Group on Artificial Intelligence and Cybersecurity was to analyse the Council and European Parliament amendments and identify any potential impact. EGMF finalised a position paper on 17 February, and later worked on suggestions for amendments, which were sent for outreach at the end of April.

In addition, in June, EGMF co-signed a joint letter with fellow organisations calling for the Cyber Resilience Act to be applied to products having real cyber risks. Following this, in July, EGMF joined forces with other non-road mobile machinery associations, asking for a transitional period that takes into account the numerous complex modifications that non-road mobile machinery would have to undergo in order to comply.

In the coming months, EGMF will continue to closely monitor the developments on this file and continue cooperation with other non-road mobile machinery associations. Moreover, the EGMF Working Group on Artificial Intelligence & Cybersecurity has also been keeping an eye on the lengthy developments on the Artificial Intelligence Act (AI Act) and occasionally supported Orgalim in its advocacy activities prior to the start of trilogues. In February, EGMF also co-signed an industry statement calling policymakers to consider a set of key principles, such as maintaining a risk-based approach and using an internationally recognised definition of 'AI system'.

EGMF will continue to follow the interinstitutional negotiations on the AI Act and members will receive updates when needed.

3. Sustainability

As an industry close to nature, sustainability is at the 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 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 and volatile supply chains, regulating products from the design phase through to daily use, repair, 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 more harmonised legislative framework that enhances innovation and circularity – essential elements 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 been monitoring the legislative process closely.

After the EU institutions reached a provisional agreement on the Battery Regulation in December 2022, EGMF's Task Force Battery analysed the text and highlighted the grey areas which should be clarified by the Commission in future guidance.

Moreover, the key delegated and implementing acts have been identified and will need to be followed closely by the task force. This is more specifically in relation to carbon footprint, performance and durability, labelling and marking, common chargers, and battery passport.

The new Regulation on batteries and waste batteries was eventually published in the summer 2023 and came into force on 17 August. It will start applying from 18 February 2024.

Packaging and Packaging Waste Regulation and common rules promoting the repair of goods

In the past year, one of EGMF's main priorities has been the European Commission's Packaging and Packaging Waste Regulation (PPWR) proposal.

This legislation directly influences several issues, including the proliferation of national labelling requirements, the obligation to register in numerous extended producer responsibility (EPR) schemes, and the difficulty of obtaining enough pure secondary raw materials.

EGMF issued a position paper highlighting our concerns and circulated amendment suggestions among the relevant MEPs and EU Member States attachés, some of which found place in their proposals. We followed up with several reactions and further suggestions to the leading policymakers from the Parliament and the national representatives.

EGMF also became active on the Directive on common rules promoting the repair of goods.

The lead Rapporteur from the European Parliament proposed an immense expansion of its scope,

encompassing many EGMF products, accompanying them with additional measures that pose safety risks to the consumers and threaten the viability of many repairers and dealer networks.

EGMF issued a response justifying the European Commission's narrower scope and arguing against the above-mentioned measures. This was followed by a meeting with the Rapporteur's assistant, which we expect will lead to the MEP's softening their position.

Ecodesign for Sustainable Products Regulation and product specific Ecodesign revisions

EGMF's 2022 outreach activities on the Ecodesign for Sustainable Products Regulation (ESPR) saw several successes. Some of them include influencing the positions of the European Parliament and Council to keep the product-by-product approach of the current Directive and secure that confidential business data is not included in the Digital Product Passports (DPP) and all information will be accessible on a need-to-know basis. In 2023, we will actively monitor the trilogues, and collaborate with our partners from Orgalim on the remaining aspects of interest for EGMF.

Furthermore, we participated in the European Commission's public consultation on which product groups should be first regulated under the new ESPR and will keep monitoring the development of the respective working plan.

When it comes to the product specific Ecodesign measures under the current Directive, EGMF and EPTA worked together on the revision of the External Power Supplies (EPS) Regulation. We produced two joint position papers and participated in a Consultation Forum meeting where we gathered support from other industry stakeholders in arguing, amongst other issues, against the obligation for our equipment's EPSs to use USB Type-C. This led to the issuing of a wider joint industry statement and finding additional alliances.

REACH Regulation

EGMF has been working on the revision of the REACH Regulation. However, the legislative proposal which had previously been expected in early 2023, is now not expected until late 2023. EGMF awaits publication of the proposal.

Despite the delay in the revision, EGMF has been highly active in responding to various restriction proposal consultations. ECHA is holding a consultation on a proposed restriction on per- and polyfluoroalkyl substances (PFAS). These substances are extensively

used in members' products due to their excellent resistance to wear as well as their excellent resistance to heat, pressure and chemical degradation. Since there are no commercially available alternative materials that offer the same performance as PFAS, members are concerned that restricting the use of PFAS would result in products that are less durable. EGMF responded to the consultation in September.

ECHA has also conducted a consultation on a possible restriction on medium-chain chlorinated paraffins (MCCP). The main functions of MCCP are flame retardance, plasticity, and extreme pressure additive, hence they are used in various applications in the garden and outdoor power equipment sector. The consultation closed in August 2023 and EGMF responded by submitting its position paper.

Finally, a further ECHA consultation on a proposed restriction on the use of bisphenols was held. These substances are used in various applications in garden and outdoor power equipment, such as hydraulic fluids, PVC, paint, lubricants, and manufacture of flame retardants and other polymer and resins. The consultation closed in June 2023 and EGMF responded by submitting its position paper.

WEEE Directive

EGMF stands ready to respond once the legislative proposal is published. It had been scheduled for 2023 but is now expected in 2024.

RoHS Directive

EGMF will respond once the legislative proposal is published. It had been scheduled for 2023 but is now expected in 2024.

4. Enforcement

While celebrating the 30-year anniversary of the Single Market, EGMF's attention has been focused on persuading EU policymakers to preserve the benefits of the New Legislative Framework which continues to play a pivotal role in strengthening the Single Market.

Since the adoption of the framework, EGMF's industry, amongst others, has also faced major transformations, particularly due to the ongoing digital and green transition. Being aware of the digitalisation potential and its benefits in product documentation, EGMF began running a campaign to call for digital declarations of conformity across EU sectorial legislation and invited the like-minded associations to join forces and spread this message as widely as possible.

Market surveillance

The EGMF Market Surveillance Task Force is keeping a close eye on a possible revision of the New Legislative Framework beginning towards the end of 2023. The Commission Staff Working Document on the New Legislative Framework evaluation study was issued in November 2022, concluding that it is overall fit for purpose, in terms of effectiveness, efficiency, coherence, and EU added value. However, the framework may not be future proof when it comes to digitalisation and EU circular economy objective, which is the core gap identified in the evaluation study. Although the European Commission does not specifically mention that it will be revised, it does refer to a future impact assessment that will explore various policy options, including a revision.

More recently, EGMF began proactively advocating for the use of digital declarations of conformity (DoCs) across all relevant EU product legislation. Therefore, in July 2023, EGMF initiated a position paper (co-signed by no less than six industry associations), calling for the update of the 'Blue Guide on the implementation of the product rules 2022' to allow DoCs to be delivered in digital format when accompanying products placed on the EU market. The paper was jointly promoted both towards DG GROW in the European Commission and on the social media channels of the co-signatories.

As a follow-up to this initiative, EGMF plans to voice the messages in the joint position paper at the next Machinery Expert Group meeting scheduled on 9 November 2023.

Standardisation policy

Over the last year, EGMF has been closely following standardisation developments mainly through Orgalim. One of the core actions stemming from the EU

Standardisation Strategy was the establishment of the High-Level Forum on Standardisation. The key task of this forum is to advise the European Commission on how to better anticipate, prioritise and address European standardisation needs in a multi-stakeholder setting.

EGMF provided contributions to the High-Level Forum via Orgalim (appointed as a member in December 2022) during the process for developing the 2024 Annual Union Work Programme on Standardisation. More concretely, together with Orgalim, EGMF suggested examples of standards in areas that should be prioritised in the next work programme.

One positive development in the European Parliament was the publication of an own-initiative report on 'an EU Standardisation Strategy for the Single Market'. The report is broadly aligned with the industry's recurrent messages on the EU harmonised standardisation process. A lot of focus is placed on the market-driven, inclusive, and non-binding nature of standards, as well as the effective participation of all relevant stakeholders in the process, including SMEs and societal stakeholders.

The next challenge is the planned evaluation of the European Standardisation Regulation. The European Commission will evaluate whether the Standardisation Regulation 1025/2012 is still fit for purpose more than 10 years after its application. In that context, a [call for evidence](#) describing the details of the evaluation was published in early September 2023.

EGMF will participate in the upcoming consultation activities which are envisaged between the third and fourth quarter of 2023.

List of Members

Full Members

Status October 2023



National Associations



Associate Members



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