

Brussels, 14 July 2022

Orgalim position paper on the transition period for Delegated Regulation on Outdoor Noise Directive 2000/14/EC

1. Introduction

Orgalim, the voice of Europe's Technology Industries, would like to thank the European Commission for the opportunity to provide an opinion on the amendment of Annex III on the method of measurement of airborne noise emitted by equipment for use outdoors to adapt it to technical progress.

2. What we support

We welcome the alignment of the noise measurement standards between the Outdoor Noise Directive (2000/14/EC) and the Machinery Directive (2006/42/EC).

3. Orgalim recommendation

The industries represented by Orgalim consider that a reasonable transition period is necessary in order to provide enough time for them to adapt their processes. This request is supported by the following reasoning:

- The capacity of Notified Bodies will be limited, because all current machine models will have to be retested;
- Seasonality:
 - When outdoor measurements are needed the weather conditions have to be considered (snow, temperature, ...);
 - Some of the products have seasonal production schedules;
- Procurement challenges: supply chains can be disrupted and lead to much longer times to obtain machines for testing;
- The prevention of the destruction of manuals (instructions and sales literature) which are normally printed once a year. Such destruction goes against the aims of the EU Green Deal and Circular Economy Action Plans;
- Administrative burden: Declarations of Conformity, instruction manuals, technical documentation and machine labels will have to be updated;

- For SMEs, retesting the machines represents a huge increase in their workload, particularly because in some cases only one person is partly dedicated to this activity;

Therefore, Orgalim recommends an amendment to Article 3 of the proposed Commission Delegated Regulation as follows:

Article 3

This Regulation shall enter into force on the [...] day following that of its publication in the *Official Journal of the European Union*.

~~It shall apply from... [Note to PO: insert exact date— [...] months after entry into force of this Regulation]~~

Member States shall not impede, for the aspects covered by this Delegated Regulation, the making available on the market or putting into service products covered by Directive 2000/14/EC which are in conformity with the Annex III of that Directive as published in the Official Journal L 162, 03/07/2000 and which were placed on the market less than 30 months after the entry into force date.

4. Conclusion

Of course, for economic reasons manufacturers want to adapt as quickly as possible to “state of the art” measurement methods, but, taking into account the aspects mentioned above, this will require some time. Therefore, Orgalim believes that a 30 month transition period, where old and new measurement methods would be allowed, is necessary.

Orgalim represents Europe’s technology industries, comprised of 770,000 innovative companies spanning the mechanical engineering, electrical engineering, electronics, ICT and metal technology branches. Together they represent the EU’s largest manufacturing sector, generating annual turnover of over €2,480 billion, manufacturing one-third of all European exports and providing 10.97 million direct jobs. Orgalim is registered under the European Union Transparency Register – ID number: 20210641335-88.

Orgalim aisbl
BluePoint Brussels
Boulevard A Reyers 80
B1030 | Brussels | Belgium

+32 2 206 68 83
secretariat@orgalim.eu
www.orgalim.eu
VAT BE 0414 341 438