
Brussels, 16 November 2007

Simpler Product Regulation

EC Proposal for a Decision of the European Parliament and of the Council
on a common framework for the marketing of products COM(2007) 53

For the companies which Orgalime represents – engineering companies whose total output in 2006 was estimated at 1779 billion euros (27% of the EU manufacturing output) - product legislation based on the “New Approach” is the core legislation regulating our products.

Orgalime therefore urges the European Parliament to carefully consider the administrative burden that the proposed Decision for a common framework for the marketing of products COM(2007)53EC could impose on manufacturers. The whole exercise should result in a legislation that is less complicated and imposes less burdens on companies.

The New Approach legislation has successfully been applied to millions of engineering products for more than 20 years and has been instrumental in the success of the EU internal market with its key benefits: free movement of products and a high level of safety for both consumers and workers everywhere in Europe. In our view the extension of the application of the New Approach principles therefore constitutes a step forward to simplify the increasingly complex legal environment for European engineering manufacturers.

Therefore Orgalime recommends opposing the following IMCO amendments n°6, 63, 64 and 66 since these changes would promote the use of the old approach instead of the new approach.

In order to preserve a simple and flexible regulatory approach, Orgalime advocates the recognition of Module “A” (internal control of production) as the preferred option for conformity assessment. The effective action to increase safe products on the European market is to strengthen market surveillance.

Therefore Orgalime recommends supporting amendment 67.

Any requirements on documentation, information or registers must be proportionate and only information that adds value with regards to conformity and enforcement of the legislation should be required. Examples of requirements that could cause unnecessary burdens are registers to be kept by the economic operator, unclear requirements on documentation and requirements to put the manufacturer’s address necessarily on the product itself.

Orgalime therefore recommends supporting amendments IMCO n°15, 91, 96, 102, 113, 116, Amendments IMCO n°17 and 92 are covering the same issue as amendment 91 and are acceptable even though we prefer amendment 91.

Orgalime recommends opposing amendment 90.

Orgalime, the European Engineering Industries Association, speaks for 35 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 23 European countries. The industry employs some 10.6 million people in the EU and in 2006 accounted for some €1,779 billion of annual output. The industry not only represents more than one quarter of the output of manufactured products but also a third of the manufactured exports of the European Union.

The requirement for manufacturers to carry out tests or keep registers on products already placed on the market, places a disproportionate administrative burden on businesses, especially for SMEs, without any added value as regards compliance of products placed on the market.

Orgalime therefore recommends supporting amendments IMCO n°86 and 89.

Consequently Orgalime recommends opposing amendments IMCO n°16, 88, 101, 104, 105.

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