

Rue de l'Hôpital 31 b2 Gasthuisstraat – 1000 Brussels Tel.: +32 (0)2 274 22 06 e-mail: ceettar@ceettar.eu

website: www.ceettar.eu

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European Organisation of Agricultural, Rural and Forestry Contractors

Confédération Européenne des Entrepreneurs de Travaux Techniques Agricoles, Ruraux et Forestiers

Europäischer Zentralverband der land- und forstwirtschaftlichen Lohnunternehmer und ländlichen Dienstleistungsunternehmer

CEETTAR Position Paper on Harmonising road circulation requirements for mobile machinery

With this position paper, CEETTAR wishes to express its views and concerns on harmonization of road circulation requirements for mobile machinery. Manufacturers of mobile machinery recommend harmonization on behalf of their members to create a common type-approval for mobile machinery like the "Mother regulation" for tractors.

CEETTAR is positive to the idea, but we have concerns regarding "masses and dimensions".

CEETTAR's views on harmonization of road circulation requirements for mobile machinery

Today there are no common EU road requirements for mobile machinery as combines, forage harvesters, loaders etc. in the EU. Mobile Machinery must comply with national legislation.

Should the common legislation on type approval for masses, dimensions, braking performance, glazing, mirrors etc. be adopted in a new EU legislation, the production of mobile machinery could (in the long run) be simplified. This could be an advantage for the producers. On the other hand, experience from the "Mother regulation" for tractors is that the pricing has increased.

Overall, CEETTAR supports the idea of harmonization. When it comes to issues as glazing, mirrors, lighting, reflexes etc., we are positive and see no major problems. But we need to insist that national impact caused by common EU legislation on masses and dimensions are considered thoroughly.

National road requirements are very different, especially concerning width. In several countries, there are no limitation on width when driving between the contractor's / farmer's place and their fields. This makes it possible to use wide tires or twin-wheels to reduce soil compaction and to be able to save the harvest under rainy conditions.

It is not convenient to mount and remount wide tires or twin-wheels every time mobile machinery must drive to the field and back. And it is also not realistic to transport mobile machinery with a lorry and a "wide load" trailer. It would be over-expensive and impossible, for example, during the harvest.

What does CEETTAR recommend?

CEETTAR believes it is recommendable to include masses and dimensions when addressing mobile machinery construction, but concerning the harmonization of road requirements, we must guarantee the possibility of national exceptions, especially concerning width.

CEETTAR does not think it will be possible to reduce permissible width on the road without losing the ability to use wide tires or twin-wheels. And without this option, we cannot reduce soil compaction and cannot save the harvest under rainy conditions.

Thus CEETTAR believes that a reduced permissible road-width will result in a loss of efficiency and economic profit for both the contractor and the farmer, especially now that the focus is on soil compaction.

About CEETTAR

The European Confederation of Agricultural, Rural and Forestry Contractors, established in 1961, represents about 150,000 companies and nearly 600,000 workers. It aims to represent the interests of land-based contractors in Europe. In 2014, the European Network of Forestry Entrepreneurs decided to merge with CEETTAR, resulting in a stronger and more representative single organisation representing land-based contractors at EU level.

CEETTAR aims to be a proactive force to benefit the contractors and the rural economy at European level. Its objective is to:

- Represent the national federations and defend their professional interests in relation to the institutions of the EU. This way, CEETTAR is recognised as representative organisation for contractors towards the European Institutions,
- Represent the national federations and defend their professional interests towards other private organisations, which are active at European level and beyond. CEETTAR maintains constructive relations with COPA-COGECA (farmers), CEMA (agricultural machinery industry), EFFAT (workers)...
- Help organisations in the new Member States to fulfil their national objectives as rapidly as possible and under the best conditions through the expertise transfer developed by the CAP 50 years ago.