



Brussels, 4th October 2017

RE: Commission Work Programme 2018

Dear President Juncker,

The foreseen legal proposal for the harmonisation of requirements for the road circulation of mobile machinery is a cornerstone of the European Single Market. As things stand currently, this lack of harmonised procedure for the homologation of construction machinery is a very evident hole in the Single Market.

This hole is not just symbolic, legalistic and/or metaphoric. This absence creates financial and administrative burden for the European industry which were quantified at € 90 million per year in an Ecorys study on behalf of the European Commission dated 2016.

This is why, CECE as representative of the construction machinery sector calls for an explicit inclusion of the road circulation proposal in the upcoming Commission Work Programme 2018.


Indeed, we are entirely convinced that such a legal text would be an integral and tangible element to implement one of the 10 Commission Priorities, namely towards a “deeper and fairer Internal Market” and in line with the Single Market Strategy.

Furthermore, let us highlight the need to swiftly publish this proposal, which the industry has been calling for years. In light of this, we call on the Secretariat General of the European Commission to follow all foreseen Better Regulation procedures, but without causing unnecessary delays.

Concretely, this proposal must be tabled as soon as possible and certainly before the 2018 summer break in order to give enough time to the legislators to deal with it and approve it before the 2019 elections recess. Publication in the autumn 2018 would remove any credible chance for the legislators and would cause disruptions and delays to the file, which the industry would have difficulty in understanding.

We remain at your full disposal for further discussions on the subject.

Yours faithfully,



Riccardo Viaggi
CECE Secretary General



Bernd Holz
CECE President