



# CECE Position on Germany's concerns raised in presentation WG-2016.41

January 2017

## Background

A formal objection was notified by EU Commission the 27<sup>th</sup> of March 2014 against EN 474-1 with regards to the provisions on visibility and a warning was published the 8<sup>th</sup> of January 2015 in the OJEU withdrawing the presumption of conformity from EN 474-1 in that regard. From the time that a clear roadmap was provided by the Machinery ADCO Group formulated with 5 recommendations, all stakeholders in CEN have been working to solve the problems since the 3<sup>rd</sup> of July 2014 (in accordance with ISO/TC 127/SC 1 Resolution taken in Ronneby).

The recommendations were:

1. Direct visibility to be preferred.
2. Improve the near field visibility by reducing the test object height from 1.5 to 1.0 m, taking into account the particular configuration of certain machines, e.g. dozers.
3. Improve the installation of additional devices (e.g. monitors, mirrors) taking account of ergonomic constraints affecting the operator. Such devices to permit a view to the rear when reversing to be positioned in front of the operator (see ISO 5006:2006, sectors A, B & C).
4. Devices for increasing visibility must not be compromised by moving parts (e.g. boom, attachments).
5. “Mirror to mirror systems” shall not be permitted.

CECE, other associations, governmental bodies and governments followed these recommendations very closely in their own guidance and recommended manufacturers to keep abreast of the development of the new edition of ISO 5006. (Circabc.europa.eu CECE document WG 2016.33), as well as Austria, UK,...)

The work of ISO in developing a new edition to ISO 5006, and of CEN in bringing forward an amendment to EN 474-1 (A5) has been entirely focussed on satisfying the demands of ADCO. This has involved stakeholders from around the world in intensive and challenging work, resulting in an ISO DIS 5006 which received unanimous approval in April 2016 and which will shortly be circulated for ISO FDIS 5006 ballot. To facilitate the involvement of ADCO Members and EU health and safety institutes, all the ISO WG meetings on this project were held in the EU.

## Machinery Working Group presentation by BG BAU

At the Machinery Working Group (9 November 2016) BG Bau stated that the revised ISO 5006 does not sufficiently take account of the movement of machines whilst working, rather than reversing, as mentioned in the 3<sup>rd</sup> ADCO recommendation.

The key point of our objection is that it introduces a completely new topic – movement while working – which was not included in the ADCO recommendations upon which the entire project has been based.

ISO is already considering this new topic in the on-going full revision of ISO 5006. When new technical requirements have been established in ISO 5006, EN474-1 will be revised accordingly to reflect this further advance in the state of the art.

The other new points raised by BG Bau regarding monitors activation and quality are addressed in ISO 16001, and are out of the scope of ISO 5006:2006. Some of the other points are already covered by the current standard and yet other-points will be addressed in the next edition, which is currently at DIS (the standard is expected to be published in May 2017).

The comment in the BG Bau presentation about 270° positioning of visibility aids refers to the movement of the upper structure. As explained above this was not in the scope of the ADCO recommendations, which were in relation to reversing. The figure of 270° was arrived at in order to allow technology-neutral compliance with recommendation 4 related to visibility aids not being compromised by moving parts.

Additionally, consensus was reached by ADCO Members to include in EN 474-1, Amd 5, new requirements on information for use related to correct setting of visibility aids and any residual risks.

## Conclusion

The existing project on ISO 5006, combined with CEN action to update EN 474-1, has successfully addressed the 5 ADCO recommendations and ADCO concerns raised later related to residual risks. The other points raised by BG Bau are being addressed in ISO 16001.

## CECE recommendations:

1. The European Commission to withdraw the warning in the OJEU when amendment 5 to EN 474-1 is published
2. All stakeholders to actively participate in the on-going full revision of ISO 5006 and to discuss in CEN TC 151/WG1 how to further address the new concerns raised by BG Bau and any new research results.

## *Glossary:*

EN 474-1:2006 + A4:2013 -- Earth-moving machinery - Safety - Part 1: General requirements

ISO 5006:2006 -- Earth-moving machinery -- Operator's field of view -- Test method and performance criteria

ISO 16001:2008 -- Earth-moving machinery -- Hazard detection systems and visual aids -- Performance requirements and tests