
CECE CONGRESS
2026
27-29 October 2026
London, UK
CREATE-INNOVATE-INSPIRE
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Laura FIUMARA
&
Martina GRIFFO

“Regulatory Update”



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CECE: Who We Are & How We Work

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Technical Policy

7 Project Teams | 2 Task Forces | High-Level Technical Policy Advisory Group

Covered by Martina Griffo Technical Policy Manager

- PT Machinery
- PT Noise
- PT Road
- PT Engine Emissions & Alternative Fuels
- PT Electrification

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Covered by Laura Fiumara Technical Policy Manager

- Technical Commission
- PT3R
- PT Data
- Decarbonisation Task Force (CO2TF)
- Digitalisation Task Force (DTF)

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“PT Machinery”



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PT Machinery: Key Legislation

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Regulation

Machinery Regulation

(EU) 2023/1230

Package

Omnibus IV

Digitalisation & common specifications

Regulation

Standardisation Regulation

Revision of Reg. (EU) 1025/2012

Directive

Product Liability Directive

(EU) 2024/2853

Directive

Radio Equipment Directive

2014/53/EU

Directive

Pressure Equipment Directive

2014/68/EU



Machinery Regulation 2023/1230: Timeline

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14 June 2023	**Final act signature**
29 June 2023	**OJEU publication of new Regulation**
19 July 2023	**Entry into Force**
20 January 2027	**Start of Application**

We are here: **implementation phase, between Entry into Force and Start of Application**

Machinery Regulation: CECE Advocacy

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PHASE 1

Negotiations

- CECE high involvement in the negotiations
- Preparation of amendments
- Advocacy coordination with other sister associations

PHASE 2 **Implementation: where we are now**

Preparing the MR Guide for Interpretation

CECE directly involved in the technical subgroups

Drafted jointly with Orgalim industry interpretations

Preparation of Position Papers and building strategic advocacy actions

e.g., Request for postponement of the application of cybersecurity and AI-related provisions in the MR

Active member of the EC Machinery Expert Group (MEG) and CEN coordination group (CoG)

Omnibus IV: Timeline

21 May 2025	**Commission adopts Omnibus IV package**
24 Sep 2025	**Council agrees negotiating positions**
25 Feb 2026	**EP ECON-LIBE adopts report**
Mar-Apr 2026	**Interinstitutional trilogues**
9 Jun 2026	**Provisional political agreement**
Next	**Final legal-linguistic revision, endorsement & OJEU publication** — We are here



Omnibus IV

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Advocacy actions

CECE, together with an industry coalition, published:

- **Joint Position Paper (link)**
- **Joint Press Release (link)**
- **Amendments proposed** (link)

Key achievements & provisions

Blue = what changed **Bold underlined** = what we achieved

- The **digital Declaration of Conformity (DoC) becomes mandatory** under the MR, with a **30-month transitional period**. Manufacturers have time to adapt their processes and systems.
- Each machine must carry a web address or QR code through which the declaration can be "**directly accessed**". But **the landing page approach was accepted** for direct access to documentation. This was a core CECE ask.
- **The emergency clause on common specifications was removed** (partial success). This limits the Commission's ability to bypass the standards route in urgent situations.



Standardisation Regulation: Timeline

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June 2025	**Commission publishes evaluation of Reg. 1025/2012**
24 Sep-17 Dec 2025	**Public consultation**
6 Oct 2026	**Commission adopts proposal (COM(2026) 780)**
Late 2026-2027	**(*awaiting*) EP & Council negotiations** — We are here
Q4 2027	**Target: conclusion of negotiations**



Standardisation Regulation: Advocacy

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Followed via Orgalim

Horizontal file

CECE advocacy

- Contributed to the public consultation(s)
- Contributed to the targeted survey
- Input to Orgalim's answers to the public consultation
- Preparation for institutional meetings with the EU

01

Improving the responsiveness of the ESS

Faster delivery of high-quality standards, with greater flexibility to avoid bottlenecks.

Want to reduce time taken from 6.1 years on average to 4 years on average

02

Ensuring a financially viable and inclusive ESS

Sustainable funding and balanced participation, alongside free access to standards with legal effect.

03

Consolidating the EU influence in international standardisation

Better coordination and participation in global standardisation while safeguarding EU strategic autonomy.



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“PT Road”



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Non-Road Mobile Machinery: Timeline

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30 Mar 2023 — **EU Commission proposal, COM(2023) 178**

8 Jan 2025 — **Publication in the OJEU**

28 Jan 2025 — **Entry into force**

NEXT DEADLINE

29 Jan 2027

Commission to adopt the secondary technical delegated acts

29 Jan 2028 — **Regulation fully applicable**

29 Jan 2036 — **End of transition period**

Until then, Member States can continue to apply their existing national road-approval laws alongside the EU framework



Non-Road Mobile Machinery: Key Elements

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Key elements of the legislation

Machinery:

- ✓ **Self-propelled machinery** intended to circulate on public roads (Covered)
- X **Towed machinery equipment** (not covered)
- X **Mobile machinery** with maximum design speed ≤ 6 km/h or > 40 km/h (not covered)

Applicability: All new non-road mobile machinery intended to circulate on public roads.

Small Series: Threshold of **70 units**.

EU Individual Approval: Granted according to provisions in Chapter IX.

What we are working on

Delegated Act | EC deadline: 29 Jan 2027

- Methodology to calculate the threshold value for masses and dimensions
- Technical requirements for NRMM intended to circulate on public roads

We expect delays

CECE in the Industry Task Force (ITF)

- Intensive work, also covering the Secretary role
- Feedback to the EU institutions



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Martina GRIFFO

“Technical Commission”



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Compliant Machinery: Our Toolkit

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Compact excavator · Compactor/roller · Hydraulic excavator · Wheel loader · Tower crane

CHALLENGES

- **Older second-hand machinery**
- **Grey imports**
- **Hard to engage authorities**

Free online platform

SCAN ME

compliantconstructionmachinery.eu

Guides free to download

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Market Surveillance: CECE Advocacy

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Advocacy points

- **Stronger bridges** between manufacturers, associations and authorities
- **Control at points of entry**: ports and customs
- **Distribute the miniguides** to empower market surveillance
- **Share our master file** and offer seminars

Where we presented

- **ADCO meetings** (twice)
- **Machinery Expert Group** (MEG), Oct 2024
- **DG GROW Market Surveillance Unit**, Sep 2025
- **Bauma 2025**: checks with the VDMA task force
- **CECE Summit**, Brussels: platform launch
- **Shared with** ERA and FIEC members

Common goals: a fair and competitive EU internal market and the health and safety of end-users



European Product Act: Timeline

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Nov 2025	**Consultations: NLF & Market Surveillance**
May 2026	**Council prepares the European Product Package**
6 Oct 2026	**Proposal postponed (alignment with sector acts)**
9 Dec 2026	**Proposal expected (tbc)** — We are (almost) here
Next	**EP & Council: ordinary legislative procedure**



European Product Act: What to Expect

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What is coming

- **"Generational revision"**: New Legislative Framework + Market Surveillance Regulation
- **~20 NLF sector acts amended:** in scope Machinery Regulation, AI Act, CRA
- **Lead**: DG GROW H.4 + Secretariat-General

Likely structure

Amending Directives via a Regulation is not legally viable: **probably more than one proposal**

Option 1
EPA Regulation (incl. amendments to sector regulations) + a Directive for sector directives

Option 2
EPA Regulation + a Regulation for sector regulations + a Directive for sector directives

Challenges ahead

- **Standardisation Regulation** likely agreed first: possible knock-on amendments
- **Negotiating** the framework and the aligned acts at the same time
- **Fragmentation**: different rapporteurs and amendments
- **Coordination** across all working groups and task forces

Followed via Orgalim (horizontal file) | CECE focus: Market Surveillance Regulation



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Laura FIUMARA

“PT 3R”



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PT 3R: Key Legislation

Package

Omnibus VIII

- Targeted amendments to EUBR
- Repeal of SCIP
- EPR obligations

Regulation

Batteries and Waste Batteries

(EU) 2023/1542

Regulation

Ecodesign for sustainable products

(EU) 2024/1781

Regulation

PFAS Restriction under REACH

(EC) 1907/2006 – Annex XVII

Regulation

F-gases

(EU) 2024/573

Regulation

Persistent Organic Pollutants (POPs)

(EU) 2019/1021

PFAS Restriction Proposal (REACH): Timeline

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Jan 2023	**Restriction proposal submitted to ECHA** (Denmark, Germany, the Netherlands, Norway and Sweden)
Sept 2023	**ECHA Public Consultation on the proposal**
20 Aug 2025	**ECHA updated proposal published**
March 2026	**RAC Opinion & SEAC Draft Opinion**
Mar-May 2026	**ECHA Public Consultation on SEAC Draft Opinion**
Nov 2026	**SEAC Final Opinion to be adopted** — We are almost here
Dec 2026	**Publication of the Commission proposal (*tentative*)**

We are here: SEAC Final Opinion about to be adopted & European Commission drafting the proposal

PFAS Restriction Proposal : What to Expect

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What is expected

- **23 industry sectors** may be covered by the EC proposal
- **Long derogation (13.5 years)** for industrial and professional uses of lubricants (harsh conditions)
- **Long derogation for MAC systems (13.5 years)** under Transport

Restriction scenarios

As proposed by the Dossier Submitters in the Background Document

Option 1: Full ban (18 months after EiF)

Option 2: Ban with time-limited derogations (5y *or* 12y after EiF)

Option 3: Continued use with strict emission limits

Challenges ahead

- **Lack of alternatives** for complex products
- Refrigerants uses in **MAC Systems** assessed under the Transport
- Derogations granted to MAC in transport to be extended to Mobile Machinery
- **Double Regulation** for F-gases

CECE Reaction Paper (Six Key Recommendations) | CECE focus: F-gases in MAC systems

Batteries Regulation: Timeline

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17 Aug 2023	**Entry into Force**
18 Aug 2024	**General application starts**
18 Aug 2025	**Repeal of Battery Directive**
18 Feb 2027	**Digital Battery Passport applies**
18 Aug 2027	**Due Diligence obligations** Postponement under Omnibus IV
Aug 2036	**Full Application**

We are here

Individual implementation measures – *Delays*

- Harmonised standards
- Secondary legislation adoption

We are here: Secondary legislation currently being adopted for implementation of EUBR rules

Batteries Regulation: CECE Advocacy

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Advocacy priorities

- **Carbon Footprint Declaration**
- **Battery Labelling and Marking**
- **Derogation on removability and replaceability** of portable batteries
- **Battery Passport** application timeline & access rights to certain information
- **Due Diligence** obligations and reporting
- Targeted Amendments via **Omnibus VIII**

Key actions

- CECE assessment and positions presented at **Commission's Battery Expert Group** Meetings
- Continued dialogue with Commission's **DG GROW and DG ENV**
- Active participation in **Webinars and Workshops** on DPP for Batteries
- **Three position papers** submitted to the Commission in 2026

CECE main involvement in the file: EC Expert Group on Waste for the Battery Regulation Implementation

Ecodesign for Sustainable Products Reg: Timeline

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18 July 2024	**Entry into Force**
Oct 2024	**Ecodesign Forum established**
16 Apr 2025	**ESPR Working Plan (2025-2030)**
20 May 2026	**Updated Commission DPP FAQ**
June 2026	**DPP Registry**
14 July 2026	**Eight DPP harmonised standards adopted**
2026/2027	**Adoption first ESPR measures**
2027/2028	**First products requirements start to apply**

We are here

DPP Operational Framework

Commission to adopt Implementing Acts for DPP operational framework

We are here: Delegated Act on iron & steel products requirements expected in Q4 2026

Ecodesign for Sustainable Products Reg: Advocacy

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Followed via Orgalim

Horizontal file

01

Digital Product Passport (DPP)

Staged Implementation, in two separate phases, with an implementation timeline of around 5 years following DPP standards

02

Iron & Steel products requirements

Scope limited to intermediate products without extending obigations to final products (i.e., machinery).

03

Substances of Concern (SoC)

ESPR information requirements should build on **SoC(a) category**, in line with the existing REACH Candidate List.



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“PT Data”



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PT Data: Key Legislation

Regulation

Data Act

(EU) 2023/2854

Regulation

Cyber Resilience Act

(EU) 2024/2847

Regulation

Artificial Intelligence Act

(EU) 2024/1689

Package

Omnibus VII

Digital Omnibus on AI – Reg (EU) 2026/1744
Simplification of the implementation of harmonised rules on artificial intelligence



Data Act: Timeline

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11 Jan 2024	**Entry into Force**
Sept 2024	**Data Act FAQs** Regular updates
12 Sept 2025	**General Application**
19 Nov 2025	**Commission Model Contractual Terms** EC Recommendations
12 Sept 2026	**Manufacturers “soft” design obligation start applying**
12 Jan 2027	**No more cloud switching charges**

We are here: **Data Act rules fully applicable to EU users of available and new connected products**



Data Act: Key Elements

Data Holder: **Manufacturer** of connected products (placed in the EU) & **Providers** of related services

Data User: Owner of connected product *or* temporary rights holder (lease, rent) over the product

Readily available data: **Raw** and **pre-processed** data generated by the use of a connected product designed to be retrievable (incl. **trade secrets** data).

New obligations for manufacturers: Mandatory data sharing free of charge to the user of connected products in **B2B**, B2C, B2G.

Products in scope: **Connected products** already available on the EU market (**No obligation to re-design products**) & **New** products

➢ What we worked on

Orgalim's Data Act guide | April 2025

- Industry guidance for **manufacturers** (OEMs, Components Suppliers, Data Users, Third Parties)
- Six **use-cases** identified relevant for the industry
- **Checklist** for Manufacturers

Key Achievements

- ✓ Direct or indirect access to data by user is determined by the manufacturer (**design choices**)
- ✓ Scope of mandatory data sharing covers only **raw** and **pre-processed** data
- ✓ Longer **transition period** for design obligations

Cyber Resilience Act: Timeline

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10 Dec 2024	**Entry into Force**	
April 2025	**Standardisation Request (M/606)**	41 harmonised standards
11 June 2026	**Chapter IV (Notified Bodies) applies**	Designation ongoing
27 July 2026	**Commission Guidance**	Assist Economic Operators
11 Sept 2026	**Reporting obligations (Art. 14 CRA)**	**ENISA SRP**
31 Oct 2026	**First core standards**	Two horizontal standards
31 Dec 2026	**Vertical standards expected**	Product-specific standards
11 Jan 2027	**Full application**	

We are here: **Manufacturers to notify actively exploited vulnerabilities and severe incidents (SRP)**



Cyber Resilience Act: CECE Main Activities

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Advocacy points

- ✓ **Machinery products (default category)** embedding critical products product classification
- ✓ **Support period** linked **to the expected use** instead of product's life-cycle
- ✓ **Vulnerability reporting** aligned with NIS2 mechanism
- ✓ Exemption for **spare parts**
- × **Longer transition period** combined with **staggered approach for NRMM**

➢ What we are working on

CECE AhG on CRA Support Period

- Develop **guidance on the criteria** to determine machinery support period
- Support construction machinery manufacturers in determining appropriate support period
- **Relevant criteria** for machinery products identified
- Compilation of **machines' digital components** providing **core functions**

Artificial Intelligence Act: Timeline

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1 Aug 2024	**Entry into Force**
2 Feb 2025	**General provisions and prohibitions apply**
5 Feb 2025	**Commission Guidelines on AI system**
2 Aug 2025	**Rules for GPAI apply & governance in place**
2 Aug 2026	**Most of rules in force and enforcement starts**
14 Oct 2026	**First hEN on AI published** — Quality management
2 Dec 2027	**Rules for HRAI in Annex III apply**
2 Aug 2028	**Rules for HRAI embedded in products covered by Annex I apply**

We are here: AI Omnibus Regulation entered in force & HRAI application timeline postponed

AI Omnibus: Key Novelties

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Key elements of the legislation

Simplified Implementation of AI Act provisions

- **AI Act targeted Simplification**
- **Stop-the-clock for HRAI rules**
- **Interplay AI Act and Union harmonisation legislation**

Key changes to AI Act & Machinery Regulation

- **Fixed timelines:** for HRAI requirements (**Stop-the-clock**)
- **New Presumption of conformity with MR EHSRs:** Compliance with AI Act standards will be sufficient where no dedicated machinery standards exist for HRAIS
- **Revised Art 8 MR:** Commission empowered to adopt delegated acts regarding Machinery EHSR in Annex III
- **More flexible implementation approach:** AI Act reqs (=EHSR) integrated into existing sectoral legislation, incl Machinery Regulation (Annex III)



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“Decarbonisation Task Force”



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CO2TF: CECE Main Activities

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National initiatives on NRMM decarbonisation

Focus on electrification

CECE-CEMA Joint Statement (LINK)

- CECE **four-pillars approach** to sustainability
- Adherence to **technology-neutrality** principle
- Recognition of **end-users needs**
- Create **favourable market conditions**

01

UBA study on eNRMM (Germany)

Machinery key concerns well taken on board in the study

02

NRMM Workshop (Sweden & Finland)

Key Message: Potential for electrification of NRMM and need to achieve certain environmental targets

03

Seminar on Construction Machinery (Norway)

Key Message: Local emissions standards for NRMM are not enough. Battery-electric equipment can do the work.

No legislative initiative at EU level

The European Commission confirmed that no regulatory action on is expected in the near future



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Thank you for your attention!



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