

## **Draft MHG Position Paper re. EN 1175:2020**

### **Disturbances out of manufacturers' control remain**

Many of the supply chain and logistics disturbances that resulted from the covid outbreak still remain. In addition, there are additional disturbances due to the Russian invasion of Ukraine and further Covid lock-down in China 2022Q2. This in combination with a high demand for material handling products has also resulted in an order backlog and partially completed machines, waiting for delayed components (semi-conductors, steel castings, ...) in order to be completed. Some Tier-1 suppliers still have difficulties in confirming delivery times, and sometimes (due to reasons mentioned) also have severe delays with short notices in their needed component modifications to meet EN 1175:2020.

### **Consequences of above become**

- Industrial trucks that were planned to be ready to comply with EN 1175:2020 before 15<sup>th</sup> of April 2023, could be delayed beyond this date due to above reasons. This results in disturbance of implementation and verification of the EN 1175:2020 requirements.
- Industrial trucks that were planned to be ready for delivery before 15<sup>th</sup> of April 2023, and built in conformity with EN 1175-1/-2/-3:2010, will possibly be placed on the market after 15<sup>th</sup> of April 2023. There are no reasonable ways to update such machines to meet the new requirements of EN 1175:2020. A delivery stop of these machines will cause major customer disturbance and impair the machine manufacturer's financial performance.
- The lack of components has necessitated the manufacturers to invest in large component stock to secure production. Scrapping of obsolete (non EN 1175:2020 compliant) components and products will cause unwanted economic and environmental impact. The material handling industry, i.e. the members of FEM IT, requests often the same type of components as the automotive industry and therefore there is a competition in the component supply. The automotive industry uses usually much bigger volumes and unfortunately it has often led to that the automotive wins with serious difficulties for the supply of components for the low volume material handling manufacturers.

### **Development effort**

The needed development projects and step change in engineering skills to comply with EN 1175:2020 have been time consuming and technically complex. Also, if started immediately when EN 1175:2020 was published, lead time for development, verification, and industrialization has been close to the latest withdrawal date in EU Official Journal.

### **Safety of the industrial truck remains**

It should be noted that the Machinery Directive 2006/42/EC is still the same and industrial trucks are mature products, working well with the current standards and they will not be more dangerous after the 15<sup>th</sup> of April 2023. The Safety record for industrial trucks contains several hundred thousand of trucks proven in use. Therefore, under these extreme circumstances, an extension of the use of EN 1175-1/-2/-3:2010 should be accepted, at least until the end of 2023. There will be new a review of this matter in mid 2023.