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Market surveillance authorities' contribution to improving the quality of harmonised standards

Regulation (EU) No 1025/2012 allows national market surveillance authorities (MSAs) to contribute to European standardisation. MSAs can provide valuable input not only at the planning stage of future requests (mandates) for the development of harmonised standards, but also throughout the drafting process as a whole. To make this happen, it is vital that Member States support participation in national standardisation activities. It is also essential to work with CEN, CENELEC and ETSI. In light of this, since 2009, the Machinery ADCO Task Force "Standardisation" has been exploring ways to improve defective standards in a cooperative manner without resulting in long delays or resorting to safeguard actions. Everybody is aware that MSAs should take a direct interest by joining their national shadow groups or joining the Working Groups directly to help draft standards. However, this presents a number of challenges, including the resources required at a time when MSAs' budgets are being squeezed. The ADCO Task Force "Standardisation" has recently started discussing with CEN/CENELEC how to design a system for ADCO members to work with Technical Committees and Working Groups on those standards where national MSAs have significant concerns.

Ergonomic standards in the agricultural sector: improving productivity and the health and safety of workers

Occupational accidents and diseases in the agricultural sector represent an enormous financial burden for the EU's public and private actors; work with machinery still poses one of the main risks to health and safety. Over the last three years, ETUI has been investigating whether agricultural machinery designers are adequately incorporating ergonomic standards into their designs. Close cooperation with OHS national experts from organisations like EFFAT, KAN, AGRISS, SVLFG, INAIL, HSE, HSA, IRSTEA, and the French Ministry of Agriculture has confirmed that they are not. The need to integrate a holistic ergonomic perspective in the agricultural sector (i.e. considering productivity, quality, safety, health and well-being as a whole) was also discussed at the draft stage of Regulation (EU) No 167/2013 on the approval and market surveillance of agricultural and forestry vehicles. Safer and healthier design solutions have recently been identified by means of the "Feedback method" applied to agriculture tractors by Dr. Strambi

and his team (USL 7 Siena) in cooperation with Regione Toscana, whose findings will be published on the ETUI website in the next few months.

Combating traditional hazards

What lessons can we learn from accidents and incidents involving machines that a) are designed without interlocking movable guards, b) are unstable during normal operation, c) provide no safe access for maintenance, and d) do not offer adequate protection against falling objects? Is it too naïve to expect a mature machinery industry to eliminate 'traditional' mechanical hazards? In its capacity as an observer within the Machinery Working Group (MWG) chaired by the European Commission, ETUI has learned that wood chippers, tractors, industrial trucks, forage balers, brush cutters, and earthmoving machinery are still involved in accidents caused by mechanical hazards.

Construction sites: how better standards can save lives

Fatalities and serious non-fatal injuries involving earthmoving machinery and telehandlers unfortunately still occur frequently on construction sites across Europe. Collisions are especially common, in part due to limited visibility around the equipment. Jobsite management techniques alone do not completely eliminate the risk to workers. The European Federation of Building and Woodworkers (EFBWW) and its Ad-Hoc Working Party on Construction Machinery/Standardisation have been monitoring this problem for two years, as part of the European Social Dialogue "Construction" carried out in partnership with the European Construction Industry Federation (FIEC). Hopes are high that the visibility of construction equipment will improve in the near future, thanks to the work of the ADCO Task Force on earthmoving machinery, chaired by Pierre Picart (French Ministry of Labour - DGT/SRCT/CT3), who recently organised an impressive technical convention in Germany bringing together manufacturers, trade unions, OHS Bodies and regulators to discuss how to improve the standard *ISO 5006:2006 Earthmoving machinery -- Operator's field of view -- Test method and performance criteria*.

New-approach consultants

Over the years EUROSHNET has been instrumental in raising awareness of the need to ensure that harmonised standards are of the very highest quality.

CEN and CENELEC Consultants have been carrying out the important task of advising technical committees in matters related to compliance with standardisation requests and applicable (essential) requirements; unsurprisingly, the recent interruption of their work has raised some concerns. Pending a solution agreed by the European Commission, CEN and CENELEC, few would argue with the principle that agreeing to fulfil a standardisation request should also mean having the capacity to acquire the knowledge needed to draft the planned standard(s), *including sufficient understanding of the legal and regulatory requirements*. What is clear from Regulation 1025/2012 is that the European Commission will have the final word on whether or not to publish the reference of a standard in the *Official Journal of the European Union*. This decision will be taken on the basis of a compliance assessment carried out in cooperation with CEN and CENELEC. It remains to be seen *how*, in particular, CEN and CENELEC will be able to contribute more effectively to compliance assessment considering that financial support by the Union is easily accessible. On balance, any CEN and CENELEC initiative aimed at improving the quality assessment of harmonised standards prior to delivery should be welcomed, regardless of how the compliance assessment required by the regulation will be implemented. ETUI argues that an efficient CEN and CENELEC *internal quality-assurance mechanism and policy* would a) reinforce trust in standard makers, b) minimise delays should discrepancies occur between the European Commission and CEN/CENELEC, and c) help redefine the consultant's role in simpler terms.

Essential requirements covered: harmonisation is in sight

Everyone agrees that the European Standardisation Organisations (ESOs) must indicate in each (harmonised) standard which legal provisions will be covered. The New Legislative Framework (NLF) package and the revised Vademecum now offer the opportunity to focus attention on *how* to do that. ETUI tends to agree with the view that ESOs should provide information on the legal requirements covered by means of a common template. It seems equally important to ensure that such information is not only available *while* a standard is being drafted (to help assess the work in progress), but is also available free of charge to all potential users of (harmonised) standards. The benefits of early and free-of-charge availability of the legal provisions covered cannot be underestimated: just consider, by way of illustration, the fact that harmonised standards can be quoted in equipment technical documentation without having to explain how the legislative requirements they cover have been fulfilled. Finally, in addition to contributing

to legal certainty, this information greatly helps ESOs when they fulfil a standardisation request by offering to the European Commission a ISO or IEC standard.

Robots: beyond physical safety

During its meeting in March this year, the Machinery Working Group (MWG) chaired by the European Commission discussed – for the first time in 20 years – the safety aspects of working with robots, in particular collaborative robots. Understandably, risk-assessment can be very complex in applications where normal operation requires human intervention in close proximity to robots. Human-robot collision is one of the OHS aspects to be considered. In addition, it is worth considering whether psychosocial risks and mental workload can be more acute when working with collaborative robots because of the many different factors involved, such as participation in decision-making, autonomy, monitoring of multiple parameters and fault-recovery. It remains to be seen whether the legitimate questions raised by H&S experts on collaborative robots will trigger not only new research into human-robot interaction, but also fresh efforts to draft standards covering risks other than those associated with collisions (currently addressed by *ISO/DTS 15066 Robots and robotic devices - Safety requirements for industrial robots - Collaborative operation*), and hopefully an open debate on the implications for work organisation in companies.

Ergonomics in machinery design: improving communication among stakeholders

Why do ergonomic requirements continue to be regarded as optional extras in machinery design? How could practical experience gained by users (i.e. workers) be systematically made available to the standards committees? Do buyers make sufficiently clear to their suppliers that they need and want ergonomically well-designed machinery? To (try to) answer these questions, ETUI has recently joined forces with the Federation of the European Ergonomics Societies (FEES), incorporating the ErgoMach open platform. The next steps in ETUI/FEES cooperation include mapping the existing networks dealing with ergonomics and machinery, collecting up-to-date enquiries and reports, mobilising academic resources and consolidating links with standard makers. This approach will hopefully raise awareness of the social and economic goals of ergonomics, and encourage H&S experts to become more involved in ergonomics standardisation.