

CLIMMAR

Lobby activities by Per Hedetoft



**Dansk
Maskinhandlerforening**
— Sikkerhed & kvalitet —
siden 1918

- The first part ISO 22172-1 RMI / User interface result FDIS voting

Result of voting
P-Members voting: 18 in favour out of 18 = 100 % (requirement $\geq 66.66\%$) <i>(P-Members having abstained are not counted in this vote.)</i>
Member bodies voting: 0 negative votes out of 19 = 0 % (requirement $\leq 25\%$)
<i>Approved</i>

Even if it has been approved, it is probably not the same as it is easy, to get all the different informations, if you are an independent operator(IO)?

But I'm quite sure that all the manufacturers have made the info accesseble on their own websites

- The second part ISO 22172-2 regards the OBD(On Board Diagnostic).
- Has got to status as a "Modified DIS document" where the WG5 has included or agreed to make the changes as supposed by the comments from the memberstates.
- This new "Modified DIS document" was made at the latest on-line meeting on June 22th and is uploaded for further comments or approval before July 24. 2020.
- The result does not show yet?

I have only participated at one meeting (out of 2 or 3?) in this group.

The goal - primary from the manufacturers, but also from the Commission is to make similar type approval as 167/2013-EU for tractors and agricultural machinery - on these NRMM vehicles.

One big goal for the manufacturers is to bring down the manufacturers costs for approvals when they bring the machines on the market in the different EU countries

The next meetings are scheduled :

13. Member States Expert Group on Non Road Mobile Machinery

24 March 2021 (pm)

17 November 2021 (pm)

WGAT 113th meeting sep.24 2020

**DRAFT AGENDA
of the 113th meeting of the
Working Group on Agricultural Tractors
24th September 2020**

09h30-13h00 – webex meeting

CIRCABC group “Automotive Industry committees and Working Groups”:

<https://circabc.europa.eu/w/browse/1af723ce-8472-47f8-bc67-9ab4269bb8c4>

1. Approval of the draft agenda;
2. Approval of the draft minutes of the WGAT meeting held on 25 September 2019: 112th meeting;
3. Update on amendments to emissions' legislation due to Covid-19 circumstances:
 - a) NRMM;
 - b) Tractors.
4. Activities carried out at OECD level;
5. Reporting obligations under Regulations (EU) Nos 167/2013 and 2016/1628;
6. Occupational and road safety subjects
 - I) Feedback discussion on:
 - a) Applicability as of 30 June 2021 of the standardised PC-VCI communication interface only to new types or also to new vehicles;
 - b) Maximum masses per axle for 3-4 axle vehicles: need for clarification;
 - c) Harmonised classification of R&S vehicles for a harmonised legislation;
 - d) Fitment of spray suppression systems on trailers wider than 2.55 m;

II) Retreaded tyres requirements.

III) Wide tyres for minimal soil compaction.

IV) Initiation of discussion on functional safety subjects.

7. A.O.B.

- a) Guidance of a UK withdrawal from the Union;
- b) Subjects on braking requirements

7. Working Group Agricultural Tractors (WGAT)

18 March 2021 (am)

23 September 2021

WGAT regarding RMI



CLIMMAR

CEMA



The latest discussions related to the single dates in the amending regulations for our sector being 2018/830, amending 1322/2014 (RVCR) and 2018/829 amending 2015/208 (RVFSR), resulted in a new interpretation by the legal services from the Commission. The result was that single dates for the implementation of legal acts are applicable to all new vehicles placed on the market, registered or put into service. This interpretation forced the unit to include a second date in extremis.

In a later stage in 2018, the commission also confirmed that according to them this date also applies to the RMI implementation date. This means that this RMI provision is applicable not only for to new Type Approvals but also for all new vehicles placed on the market, as of July 1st 2021.

Although most of high range tractors are ISOBUS compliant, which makes the changeover much easier, that is only a portion of the total tractor sales. A large part of the tractor models still uses existing highly customized off-board proprietary diagnostic solutions. Therefore, the industry decided on its own initiative, to standardize under ISO TC23 WG5 the access to the OBD with ISO 22172-2. This work started in AEF, the Agricultural industry Electronics Foundation, as soon as the agreement on the delay for the implementation date was confirmed. In addition, the publication of the ISO 22172-2 standard will take place at the end of 2020. This planned date for publication makes it for the OEMs already very challenging to integrate these new specifications for new Type Approvals. It will be impossible to apply for ALL Type Approvals and therefore all new vehicles placed on the market after July 1st 2021. OEMs will have to modify their processes and have to re-develop the tool, architecture on many products/vehicle models. The stack of Hardware and Software solutions for the different layers have to be assessed. This replacement will force an update of existing models or the phasing out of existing models, which will lead to higher cost for manufacturers and consumers, while having limited impact on competitiveness of repairers, independent and authorised. If companies cannot organise a phased in approach for these non-ISOBUS models with the proper lead-time, it could result in these often simpler and cheaper models, to be taken out of the market. Also depending on the company and category of vehicles produced, the phase of non-ISOBUS models they produce, is

WGAT regarding RMI

- The Commission representative clarified that the Repair and Maintenance Information (RMI) for tractors will not be linked to the On-Board Diagnostics (OBD), unless otherwise specified in the legislation. Particular requirements on OBD, in comparison to the ones of M and N-categories vehicles are that they will apply only to new types, not to new vehicles of old types. The application will be **from, 30 June 2021.**
- The Commission representative understands that two types of RMI requirements can be differentiated in the legislation. Provisions relating to providing access to information through websites, which do not require any modification on the vehicles themselves, and, provisions enabling the diagnosis and repair of each specific vehicle through the on-board diagnostics (OBD) port, or vehicle communication interface (VCI). This is the case of the requirements set out in point 2.5.1 of Appendix 1 of Annex V to Commission Delegated Regulation (EU) No 1322/2014, which requires to fit vehicles with a standardised PC-VCI communication interface by 1/7/2021 to allowing the diagnosis and repair of agricultural vehicles with generic diagnostic tools accessing via the OBD port. In this particular case, the Commission acknowledges that a large part of the tractor models still uses existing highly customized off-board proprietary diagnostic solutions. We are also aware that the industry is voluntary working through the Agricultural industry Electronics Foundation to define a harmonised standard for the OBD port. The standard should be finalised by end of 2020. In conclusion, considering that a standardised PC-VCI interface would imply a substantive change in the electronic architecture and protocols of the OBD system, both hardware and software, and considering that these provisions apply to agricultural and forestry vehicles for the first time ever, the Commission agrees to consider that the 4 requirements set out in point 2.5.1 of Appendix 1 of Annex V to Commission Delegated Regulation (EU) No 1322/2014 shall apply to new types only and, therefore, **shall not apply to existing vehicles approved in accordance with vehicle types type-approved before that date.**
- CEMA, supported by IT, asked for a public statement of these clarifications.
- The Commission representative ensured that these will be reflected in the current minutes and considered this being also the requested public statement. With no more comments from the attendees, this point was concluded.

WGAT joint statement

- COPA-COGECA presented a joint presentation by COPACOGCECA/**CLIMMAR**/CEETTAR on the request for allowing in the EU legislation for agricultural / forestry vehicles type approval vehicles with width greater than 3m, which is the maximum limit for EU type-approval, and technically permissible maximum laden mass per axle greater than 10.000 kg, due to the need of using extra wide tyres on the same vehicles and more payload, when used for the various works on the fields, following the year's seasonal works.
- Such extra-wide vehicles are allowed in certain Member States and the current limitation of in the EU type-approval legislation is considered as technical and not circulation ones by certain Type-Approval Authorities. As a consequence, such vehicles are not granted EU type-approval. The national approval or individual approval are too burdensome solutions for the industry and therefore the three associations presented this request, with the proposed solution of introducing in the Regulation (EU) 2015/208 (RVFSR) provisions for permitting masses and dimensions in excess of the limits for EU type-approval where this is permitted by the Member State. DK commented that higher than the EU limits masses of vehicles would influence the Member States infrastructure and considered that, whilst the type-approval may be harmonised, the circulation rules should remain under national responsibility. DE expressed the same opinion and, upon Chair's request, agreed to make available to the Commission a document describing the way in DE the vehicles are accepted when conformal with the EU type-approval, but their circulation is allowed according to national rules dictated by the infrastructure limitations. The Commission representatives clarified that indeed the Member States limit the vehicles' masses values for their circulation to lower values than the EU type-approval limits, but the dimensions are in accordance with the EU type-approval for all Member States; therefore, masses and moreover dimensions limits in RVFSR should concern EU typeapproval only and their modification would need the consultation of the Member States and DG MOVE. Furthermore, the Commission representatives proposed as solutions either the aforementioned one or individual national approval, whilst in the meanwhile it could be checked the number of the Member States that would allow for the circulation in their territory of agricultural / forestry vehicles with mass and dimensions limits in excess to the EU type-approval limits. 5 Concerning the amendment of mass limits for 3- and 4-axled vehicles, the Commission representative reminded that the same subject was discussed at the 25/9/2019 WGAT and, according to the feedback received from the WGAT participants, there is support for a harmonised approach, without however leading to any conclusions on the way this could be done and with which mass limits. IT considered this subject as an EU-wide one, whilst the one from the COPA-COGECA presentation a national one, and requested for a fast solution for the former. CEMA, whilst agreeing with the response of the Commission representative to IT that the practice is to amend the legislation on all subjects needing an update, commented that the 3- and 4-axled vehicle issue concerns vehicles that already circulate in the EU, in comparison with the issue from COPA-COGECA that concerned excess of the mass and dimensions' limits; the latter could be also dealt with at a later stage of legislative amendment. With no more comments and in the lack of any conclusion of the way forward, the Commission representative invited the Member States to provide with their final feedback to the Commission by 30 October 2020.

Securing the possibility for minimization of soil compaction



Joint proposal by COPA-COGECA / CLIMMAR / CEETTAR

Our common goal

- We are not proposing to increase width and axle load in regulation EU167/2013 (TMR – Tractor Mother Regulation)
- We are proposing to ensure that national legislation concerning use of wide tires, double tires etc. is not blocked by TMR

Adding technical data

We ask that manufacturers are given the possibility for adding technical data in TMR – only to be used in countries that has a tradition for allowing masses and dimensions exceeding TMR.

What is technical data:

- E.g. documentation that an axle is constructed for tires >3.0 m
- E.g. documentation that an axle can support axle load >10 tons

This do not mean that all member states must allow larger masses and dimensions in general.

Two examples

- France allow >10 tons axle load
- Denmark allow tire width >3 m, when using wide/low pressure tires on slurry tankers, seeders, special tractors etc.
- TMR approval will block those national possibilities
- We do not see national approval as a solution.
Manufacturers will have twice the work, and prices will go up

Off-road use

Even off-road use of tires >3.0 m and axle load >10 t can be blocked by TMR.

- National authority has interpreted TMR data as constructive limitations – thereby unsafe to exceed, even off-road
- Adding technical data solves this problem

Why the use of wide tires and double tires are essential

Under wet conditions, e.g:

- Under the maize harvest in the 2019 autumn
- Driving slurry in the wet 2020 spring
- Wet conditions occur regularly (approx. every 3-5 year)
- We must keep the possibility for wide tires and double tires to minimize soil compaction in general and to ensure harvest

WGAT joint statement

2019 maize harvest



When applying slurry: Protecting low and humus rich soils



Harvest of sugar beets – late fall



Flexibility to cope with the seasons



Same machine four different time a year
The flexibility of the machine

How do we solve this!

We ask you to help us with this problem:

- We have consulted the commission
An option is looking into legislation on trucks / busses (2018/858)
- Our first idea was adding to 2015/208 annex XXI and XXII
(Supplementing Regulation of EU167/2013)

Our immediate idea

- **ADDED AS 2.4.0. IN ANNEX XXI:**
The manufacturer can state in the approval that T, R, S cat. vehicles are designed for dimensions exceeding EU167/2013 for national use when permitted.
E.g. tires and double mounted tires wider than 3.0 meters.
- **ADDED AS 3.2.3. IN ANNEX XXI:**
The manufacturer can state in the approval that T, C cat. vehicles are designed for Permissible Towable Mass and Technical Permissible Towable Mass exceeding EU167/2013 for national use when permitted.
- **ADDED AS 2.3.3. IN ANNEX XXII:**
The manufacturer can state in the approval that T, C, R, S cat. vehicles are designed for masses exceeding EU167/2013 for national use when permitted.

- Your input:
How do we solve this problem?
- What is the commission opinion
in terms of legal possibilities?

WGAT joint statement

- Discussion with a manufacturer homologation person
- To make a conclusion – yes, you are right there are many machines now that are restricted only to the values from TMR (10 ton and 3m for R and S). ?
- When we speak for a tractor, because it doesn't have any tanks for material, it is usually designed for exactly what is written on the PIN plate. If the PIN plate says 10 ton, then the axle is really designed for 10 ton and this is valid everywhere – in the field and on the road.
- Dealer – we want to increase the axle weight because this is possible according to the local law, so is this possible? I look at their request and usually I am able to authorize this change. Then they ask me for a document allowing this and the make a national second stage homologation.
- If there are possibilities to change this, like for example in Denmark with tires wider than 3,0m, then this is OK, but it has to be managed locally – by the local market.
- Do You prefer every costumer/owner to each machine/vehicle/tool/trailer has to contact the local dealer, who then has to contact the national importer, who the contacts You – to get a second stage approval??
- Just to get legal access to use the tool, vehicle, trailer as it originally is designed – but then afterwards restricted by TMR regulation 🤖
- I personally think that this will be totally out of proportions, and it will overburden both CLIMMAR and CEMA members with Bureaucracy!

Questions? Comments