



Update on CEMA lobby issues

Reasons to get involved in EU
decision-making

16 October 2015



Message 1

“The heaviest penalty of refusing to engage in politics is that the rules will be made by others.”

Plato

Message 2

“You can only win at politics if you become involved in politics.”

Message 3

The EU needs YOU!

RMI

(Access to Repair and
Maintenance Information)

The challenge of RMI

- ▶ Not the easiest topic to start with!
- ▶ Both a:
 - ▶ highly **political** issue
 - ▶ complex **technical** issue
- ▶ Exact consequences for the sector not fully clear yet, but could be far-reaching...
- ▶ Different sides of the same coin:
 - ▶ Opening the after-sales market vs.
 - ▶ Higher risk of non-compliant machinery?

BASICS of RMI provisions for agricultural machinery manufacturers

Interface through website, USB, CD, email, server

- Always get full package
- Manufacturers decides on training and skills needed to use information/tools

Authorised users

MANUFACTURER

- Selective purchases are possible
- Skills/tools and training are no prerequisites to get information

Independent operators

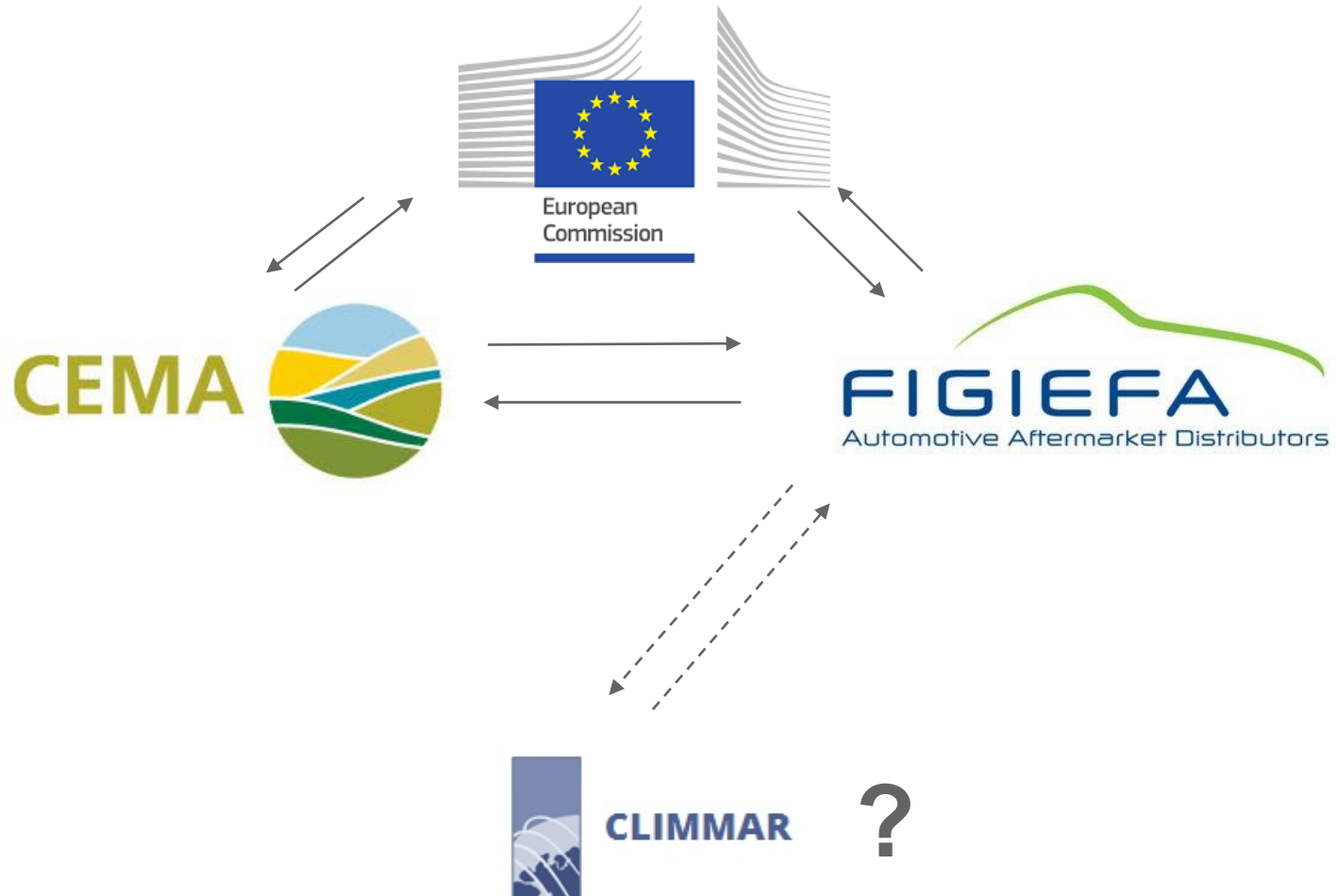
Development of generic diagnostic tools – views of CEMA

- ▶ **Burden for manufacturers:**
 - ▶ Encrypt the data
 - ▶ Make an interface so information can be read and parameters can be changed through a gateway.
- ▶ **What do manufacturers need?**
 - ▶ **NEED FOR FLEXIBILITY:** Some companies with too small series/volumes will never be asked for their information (investments without any benefit)
 - ▶ **NEED OF LEAD TIME:** 2016-2018 is near...
 - ▶ **NEED FOR ALIGNMENT:** STAGE V is a major change-over
- ▶ **SOLUTIONS:**
 - ▶ **POSTPONE** the implementation till after the introduction of stage V
 - ▶ Make a **TIMELINE** to provide information **PART OF THE NEGOTIATED CONTRACT.**

We have seen it all before...

- ▶ The new **‘Mother’ Regulation 167/2013** (new EU type approval scheme for agricultural vehicles) comes with a wealth of new & burdensome technical provisions (on e.g. braking performance, exterior projections and interior fittings, RMI etc.)
- ▶ Yet another **diesel engine emissions stage (Stage V)** will need to be mastered by the industry in 2020 – and will result in significant R&D costs for re-designing and re-type approving machines (and new rules on replacement engines)
- ▶ And things will not stop there!

The trilogue on RMI



RMI – what is happening & what is at stake?

- ▶ Major discussion on RMI so far was:
 - ▶ NOT OEM-independent repairers BUT OEM-supply chain
 - ▶ NOT about RMI BUT about in-vehicle data
- ▶ **Question for CLIMMAR to consider: is FIGIEFA defending the interests of the independent repairers on the agricultural side?** (We feel they [and the European Commission] are not really familiar with the specificities.)
- ▶ **NB:** any cost for the OEM will likely also be felt by the dealers.

Open issues

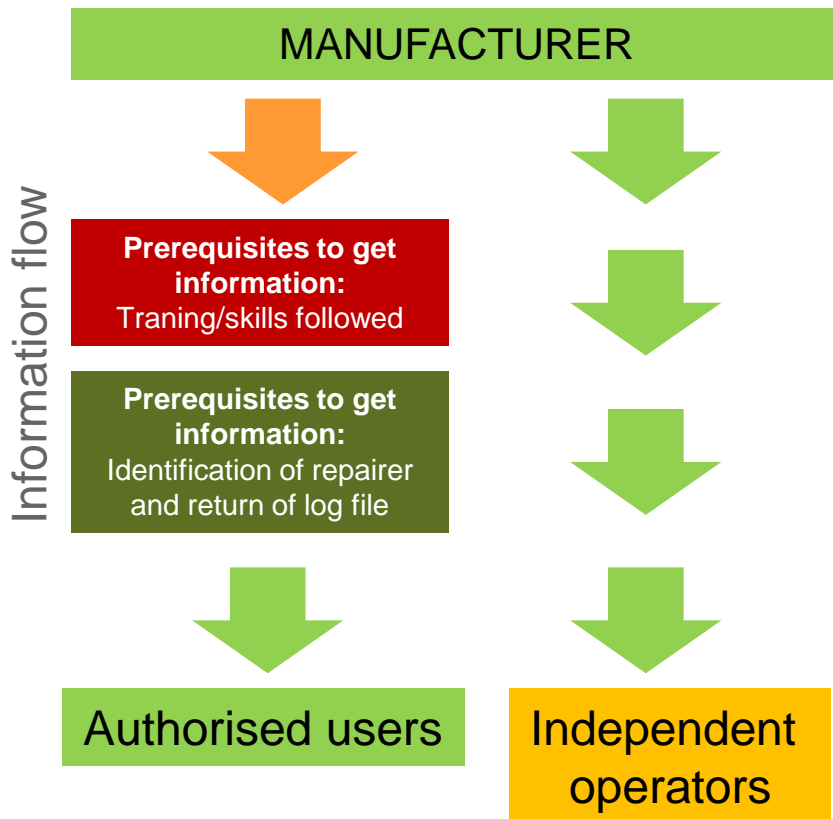
1. **Protection of the in-vehicle architecture**
2. **When to provide information for the development of generic diagnostic tools**

Effects:

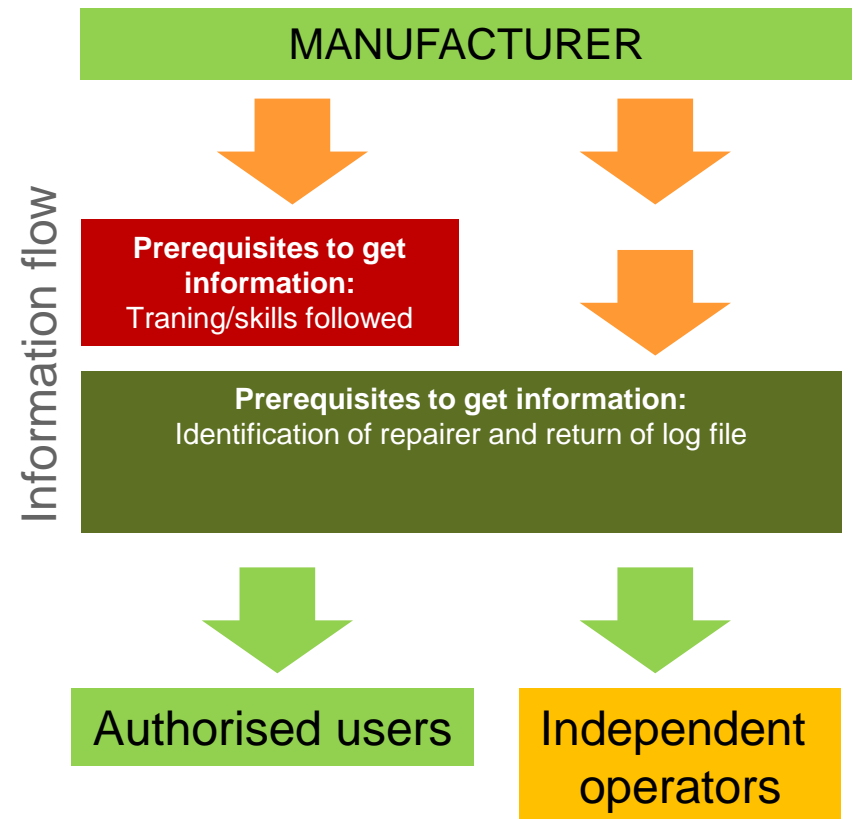
- ▶ Multi-brand diagnostic tools to come
- ▶ But: OEM may start to protect more their software and in-vehicle architecture, making it harder for authorized and independent repairers to get access.
- ▶ Some repairs and some engineering changes on machines will be forbidden for all repairers in order to protect IPR, logics in software, and to protect against tampering (as required by law).

Protection against tampering and unauthorised use

Current provisions in the legislation for non-secure areas



Industry request in relation to tamper sensitive systems and in relation to prevent unauthorised misuse of software critical for the correct functioning of the safety and environmental control systems



Open issues (2)

- ▶ OEMs will try to get information on independent repairs via contracts with independent tool manufacturers.
- ▶ However, repair-related aspects such as health and safety at work or required skill to operate certain tools cannot be controlled directly by OEMs.

Effects:

- ▶ Inspection of health and safety at work differs between EU Member States
- ▶ In some countries, there could be a structural disadvantage for authorized dealers (race to the bottom)?
- ▶ Will depend on what the business case and effect on the market will be....

What does CLIMMAR want on RMI? (1)

1. Possibility to multi-brand without special legal constraints?

Issues for discussion:

- ▶ currently possible under special conditions.
- ▶ branding and consolidation will likely continue to get even fiercer.
- ▶ RMI could even accelerate the process.
- ▶ could be a point of discussion between CLIMMAR and CEMA on how to proceed and make multi-branding an asset in the business.

What does CLIMMAR want on RMI? (2)

2. Harmonisation on how information is provided by different manufacturers?

- ▶ CEN TC144 standard will define terminology and guidance on how information is provided. CLIMMAR to ask for liaison status (independent stakeholder)?
- ▶ FIGIEFA appears to favor copy-paste from the very restrictive standards for the car-sector. That would be burdensome for the industry.
- ▶ Standard still needs to be adapted:
 - ▶ Start open dialogue on how we can support the process taking into account the enormous diversity of machines and the costs related to such changes, certainly for our SMEs.
 - ▶ CLIMMAR should be directly present in those meetings.
 - ▶ Also our industry is only learning slowly and there is plenty of time to discuss together how to proceed.

“What is to be done?”

Getting involved: possible actions & activities for CLIMMAR to consider

- ▶ Establishing an internal Task Force/Working Group on RMI

- ▶ Working out a detailed position & mandate on the issue

- ▶ Nominating delegate(s) who:
 - ▶ can come to Brussels regularly and be at the table when discussions are happening
 - ▶ join CEN TC144 (liaison status)

- ▶ Join discussions with FIGIEFA, CEMA, the European Commission

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Thank you!

CEMA Secretariat

T +32 (0)2 706 81 73

secretariat@cema-agri.org

Boulevard A. Reyers 80

B-1030 Brussels

www.cema-agri.org

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