



## POSITION PAPER

Brussels, 6 October 2025

## CECE Position on the Impact of Revised Standardisation Procedures: Concerns on EN 474 and the HAS Assessment Process

Serious challenges in the European standardisation process are jeopardising the amendment of the EN 474 series “*Earth-moving machinery — Safety*”, which are critical for CECE-relevant products. The amendment was intended to address a key technical limitation in the current series but the process has been **delayed** due to procedural complexities, **inconsistent** HAS assessments, and the requirement to **revise all parts** of that multi-part standard. All these elements induced by the current HAS consultant process lead to the risk of de-harmonisation of the series and undermine the NLF. The problems appear to be systemic and across multiple sectors. As a result, manufacturers may need to manage compliancy requirements individually, without the support of hENs, creating fragmentation and uncertainty across the EU market.

CECE of which some of its members are involved in the work of **CEN TC 151/WG1** would like to address the following significant shortcomings in relation to the revised European Standardisation process. Specifically, WG1 asked CECE to draft this position paper due to the urgency of the matters below in light of the upcoming October Machinery Expert Group meeting.

As a result of the issues the responsible CEN Working Group (WG) has been unable to progress the development of an amendment to the EN 474 series (*Earth Moving Machinery safety*) that was initiated to resolve safety aspects in the existing standard. This standard is fundamental to products in scope of CECE and hence it was felt necessary to bring these concerns to the attention of the European Commission during the Machinery Expert Group meeting.

The issues arise from the outcome of the HAS assessment of EN 474:2022/prA1 as well as the broader challenges associated with the harmonisation process. The most relevant concerns can be categorised as follows:

- a) While the previous revision of EN 474-1:2006 was subject to six amendments, without the need of updating the sub-parts, it **no longer seems possible to amend a single part** of a multi-part standard without reopening the entire series, for the sole purpose of updating the normative references of the parts constituting the series. However, to

address safety issues due to detected shortcomings, the possibility to quickly amend specific clauses of a standard must remain possible instead of revising the whole standard or the complete series; a burden without any safety added value.

- b) Standards, even when recently harmonised, are required to **undergo full assessments** by both CCMC and the HAS consultants, even in cases such as that of EN 474:2022/prA1, where the amendment is only limited to a specific clause. This puts unnecessary burden on the WG to revise a consolidated text and implement changes which may change the current approach jeopardising the understanding of the standard by stakeholders.
- c) Different **HAS consultants** are providing **inconsistent and sometimes contradictory assessments** on the same document. This lack of coordination and diverging input pose a serious challenge for experts expecting work-continuity, creating delays in the publication of the standards with a consequent potential cancellation of the project.

The result is that draft standard documents, though reflecting the state of the art and intended to be harmonised, are not progressing to publication, undermining the core principles of the NLF. CECE believes that there is a serious **risk of de-harmonisation**, if EN 474:2022/A1 is published without the consideration of the described concerns. Moreover, CECE is informed by its members that the same issues are affecting CEN WGs in other product sectors.

## *Case Study of EN 474-1:2022/prA1*

### **Purpose:**

The amendment procedure was initiated to amend the test requirements of clause 4.12.7. regarding Fitness for purpose requirements which could not be practically or safely implemented by manufacturers.

### **Process and Challenges:**

Following working group review, clause 4.12.7 was amended and a CIB launched which received approval from the National Standards Bodies (NSBs).

The draft was then submitted to CCMC for quality checking. The quality check was performed on the whole document which led to a number of issues that were addressed by a WG1 ad-hoc group during several meetings.

Once this work was completed the draft was reviewed by the full WG1 for endorsement and submitted for HAS assessment:

- Result of the 1st HAS assessment was lack of conformity because of missing functional safety requirements, however this was later shown to be incorrect since separate hENs can be used to address the requirements justifying a scope exclusion.
- As a result, a 2<sup>nd</sup> HAS assessment was made by a different HAS consultant. Again, a lack of conformity was concluded by the Consultant, stipulating the need to update normative references throughout the series thus requiring a revision of all thirteen parts. Furthermore, the consultant requested that the modified fitness for purpose requirement shall be moved from EN 474-1 to the specific machine related part as appropriate. This is in contradiction with existing editorial rules according to which

for multipart standards, if more than 2 parts are concerned by a specific requirement, the requirement shall be addressed in the part 1 “general requirement”.

Whilst HAS assessment activity has progressed the draft has been balloted in NSB’s and has been approved by a significant majority.

**Possible Outcomes:**

In case publication does not happen, manufacturers will have to decide individually how to manage requirement 4.1.3 of Machinery Directive which, as has been established, cannot be met in practice.

Alternatively, continuing with CEN publication, without incorporation of the result of the HAS consultant assessment, could lead to the de-harmonisation of the entire EN 474 series.

Finally, making the requested changes to the existing thirteen standards, based on the HAS assessment provided on EN 474-1/A1, will only further delay the development of a future revision that will align with the requirements of the Machinery Regulation.