# UN/ECE WP 6 International Model for Technical Harmonization Earth-Moving Machine Safety

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## **Outline of Presentation**

- Earth Moving Machines
- International Model for Technical Harmonization
- Experience With Model
- Improvements for Compliance Clause



#### **Earth-Moving Machines (EMM)** Machines for Excavating, Loading, Transporting, Spreading and Compacting Earth and Other Materials.



## **Earth-Moving Machines**

- Global Industry
- Multiple National Requirements Are Challenge for Low Volume Industry
- Industry Promotes
  - High Safety Level
  - ISO Standards as National Standards
  - Technical Requirements for Regulations from ISO Standards



## International Model for Technical Harmonization

- Industry Associations From EU, USA, and Japan Worked Together to Develop an International Model for Earth-Moving Machines in 2004.
- The International Model Outlined General Principles for Technical Regulations Following the WP 6 Guidelines.
- The International Model Is Based on the Technical Requirements From the ISO 20474 Machine Safety Standard.



## UN/ECE WP6 International Model for EMM

**1. Scope Statement – Applies to Earth-Moving Machines Defined by ISO 6165** 2. Machine Requirements – Minimize **Machine Safety Risks During Life Cycle of Machines Using Technical Requirements in ISO/TC 127 Standards** 3. Compliance Clause – Use Supplier's **Declaration of Conformance (SDoC)** Defined in ISO 17050 Parts 1 and 2 4. Market Surveillance – National Level

## General Experience Promoting UN/ECE International Model

- Currently Working With China, Russia, India, Korea, and Chile.
- ISO/TC 127 Standards Are Accepted as National Standards, With Some National Differences Due to the Culture, Social and Technology Level
- The General Principles of the International Model Regulation Can Be Applied to Different Types of Regulatory Processes.
- Additional Guidance is Needed for the Compliance Clause in International Model

#### **Conformity Assessment Experience**

- The USA, Japan, and Other Areas Accept the Manufacturer's Commitment of Conformity Assessment
  - Europe Has New Approach Directives
    - The New Approach Directives Emphasize the Use of Harmonized Standards
    - Recommends Conformity Assessment by the Manufacture
    - SDoC is Accepted for EMM (ISO 17050)
  - Developing Economies Generally Do Not Accepted SDoC, But Require Third Party Certification

#### Conformity Assessment - Challenges in Developing Economies

- Manufacturers So Far Are Not Trusted to Do Their Own Compliance Declaration
- Some Small and Medium Manufacturers Are Considered to Need Help With Conformity Assessment and Certification
- Resources for Market Surveillance Are Limited and a Third Party Conformity Assessment and Certification Process Is Considered As a Way to Compensate for the Challenges With Market Surveillance

#### **Improved Conformity Assessment**

- Long Term Goal Still Is Manufacturer Compliance Commitment - Supplier's Declaration of Conformity
- In Some Economies Where Manufacturers Are Not Prepared to Do SDoC or Are Not Trusted Yet to Do SDoC, the Assistance of a Third Party May Be Necessary for Conformity Assessment.
- For These Economies, the Manufacturer Can Work With a Third-party for Conformity Assessment. Conformity Assessment Testing That Has Already Been Done by the Manufacturer Can Be Used If the Manufacturer Has the Following:
  - A Quality Plan That Is at Least Equivalent to ISO 9000
  - A Documented Conformity Assessment Process
  - A Conformity Assessment Group to Manage the Conformity Assessment
  - Access to Conformity Assessment Facilities (Internal or External)

## **Summary UN/ECE Project**

- Global Harmonization of Machine Requirements Based on ISO Standards Allows Global Market Access for All Manufacturers
- Allowing Some Regional Differences Is Beneficial For Developing Economies
- Conformity Assessment Is Still a Challenge
- The Proposal in the UNECE International Model for EMM Addresses This Challenge
  - Maintain Long Term Goal of SDoC
  - Recognize the Need for Third Party Assistance
  - Promote Cooperation Between the Third Party and the Manufacturer to Minimize Conformity Assessment Time and Cost