

Open Public Consultation on an evaluation and possible revision of the Outdoor Noise Directive 2000/14/EC

Fields marked with * are mandatory.

Introduction

The European Commission is evaluating the performance of the current legislation on the noise emission in the environment by equipment for use outdoors: the [Outdoor Noise Directive \(OND\) 2000/14/EC](#) (*), covering some 57 types of outdoor machinery, such as those used on construction sites or in parks and gardens.

At the same time, based on the information received so far, it is also considering the possibility to develop a legislative proposal to revise the Directive, taking into consideration the EU legislative framework on health and safety of products in the internal market, and the technical progress and the state of the art in this industrial sector. More information on the possible revision can be found in the [Inception Impact Assessment on the revision of Directive 2000/14/EC](#).

(*) Directive 2000/14/EC of the European Parliament and of the Council of 8 May 2000 on the approximation of the laws of the Member States relating to the noise emission in the environment by equipment for use outdoors (OJ L 162, 3.7.2000, p.1), as amended by Directive 2005/88/EC of the European Parliament and of the Council of 14 December 2005 (OJ L 344, 27.12.2005, p. 44) corrected by Corrigendum (OJ L 165, 17.6.2006, p. 35) and by Regulation (EC) No 219/2009 of the European Parliament and of the Council of 11 March 2009 (OJ L 87, 31.3.2009, p. 109). The list of the relevant national transposing legislation is available in [EUR-Lex](#).

This consultation aims to collect contributions from all interested parties, stakeholders, organisations and citizens in general potentially affected by the Directive on its functioning or by any modifications potentially made to it. Contributions are particularly sought from:

- institutions of national authorities;
- enterprises, business professionals, and business associations or organisations;
- consumer organisations, trade unions, research and academic institutions, and individual citizens.

Contact

DG Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) - Unit C.3 Advanced engineering and manufacturing systems: GROW-C3@ec.europa.eu

Specific address for Noise Emission by Outdoor Equipment: GROW-DIR-NOISE@ec.europa.eu

About you

*1 You are welcome to answer the questionnaire in any of the 24 official languages of the EU. Please let us know in which language you are replying:

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovenian
- Slovak
- Spanish
- Swedish

*2 You are replying:

- as an individual in your personal capacity
- in your professional capacity or on behalf of an organisation

*9 Respondent's first name:

50 character(s) maximum

Zsuzsa

*10 Respondent's last name:

50 character(s) maximum

KOUBAA

*11 Respondent's professional e-mail address:

zk@bibm.eu

*12 Name of the organisation:

100 character(s) maximum

BIBM European Federation for Precast Concrete

* 13 Postal address of the organisation:

100 character(s) maximum

55 Rue d'Arlon 1040 Brussels

* 14 Type of organisation:

Please select the answer option that fits best.

- Private enterprise
- Professional consultancy, law firm, self-employed consultant
- Trade, business or professional association
- Non-governmental organisation, platform or network
- Research and academia
- Regional or local authority (public or mixed)
- International or national public authority
- Other

* 17 Please specify the type of organisation:

- Chamber of commerce
- Business organisation
- Trade Union
- Representative of professions or crafts
- Other

* 23 Is your organisation included in the Transparency Register?

If your organisation is not registered, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#)

- Yes
- No
- Not applicable

* 24 If so, please indicate your Register ID number:

20 character(s) maximum

07055806769-32

* 25 Country of organisation's headquarters:

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus

- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

* 27 Your contribution,

Note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation \(EC\) N° 1049/2001](#)

- can be published with your organisation's information** (I consent the publication of all information in my contribution in whole or in part including the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- can be published provided that your organisation remains anonymous** (I consent to the publication of any information in my contribution in whole or in part - which may include quotes or opinions I express - provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication)

* 28 How familiar are you with the Outdoor Noise Directive 2000/14/EC?

- I have detailed knowledge of the Directive, its objectives, the limits and the requirements / obligations that it imposes
- I am aware of the existence of the Directive but not of all its specific contents
- I do not really know the Directive

* 33 Which type of stakeholders does your organisation / association represent?

Multiple choice allowed

- Manufacturing companies of outdoor equipment covered by Directive 2000/14/EC
- Rental / lease companies of outdoor equipment covered by Directive 2000/14/EC
- Companies / entities that use outdoor equipment covered by Directive 2000/14/EC

- Workers
- Consumers / Private users
- Environmental protection
- Other

General information

35 Please state the extent to which you agree on the following statements on Directive 2000/14/EC:

	Strongly disagree	Disagree	Agree	Strongly agree	Do not know / No opinion
* The Directive has ensured harmonisation of rules and procedures across the EU for the covered outdoor equipment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The Directive protects the health and well-being of citizens and the environment, by reducing permissible noise levels of outdoor equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The Directive supports adaptation to technical progress for equipment in the scope	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The Directive has had an impact on competition from manufacturing companies outside of the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

36 Please explain:

500 character(s) maximum

37 In your opinion, to what extent did Directive 2000/14/EC have effects to any of the following?

	Strong negative effect	Negative effect	No effect	Positive effect	Strong positive effect	Do not know / No opinion
* Research, development and innovation on equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Noise performance of equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Level of compliance of equipment / Prevention of non-compliant equipment on the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Information to customers / users	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ability of sectorial SMEs to compete in the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

38 Please explain:

500 character(s) maximum

39 To what extent do you agree on the following statements?

	Strongly disagree	Disagree	Agree	Strongly agree	Do not know / No opinion
* By merging previous legislation (7 product and 2 procedure Directives), Directive 2000 /14/EC improved the effectiveness and internal coherence of EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Directive 2000/14/EC complements other EU legislation / policy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Directive 2000/14/EC complements non-EU / national legislation / policy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* There are overlaps / conflicts with other pieces of EU legislation (in terms of requirements, terminology, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There are overlaps / conflicts with other non-EU / national legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The implementation of Directive 2000/14 /EC through national transposition acts was adequate and timely	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

40 Please explain:

500 character(s) maximum

41 To what extent do you agree on the following statements?

	Strongly disagree	Disagree	Agree	Strongly agree	Do not know / No opinion
* Noise emissions by outdoor equipment subject to noise limits (Article 12) have been reduced thanks to Directive 2000/14/EC	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Noise emissions by outdoor equipment subject to noise marking only (Article 13) have been reduced thanks to Directive 2000/14/EC	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Noise emissions by outdoor equipment would have been reduced anyway without the Directive due to technological development and the market itself	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

42 Please explain:

500 character(s) maximum

* 43 In your opinion, does the Directive have effects or impacts that would be unrelated directly to its policy goals (the policy goals of the Directive being: smooth functioning of the EU internal market, protection of health and well-being of citizens and of the environment)?

- Yes
- No
- Do not know / No opinion

45 According to your experience, which sectors have the largest share of non-compliance with the requirements of the Directive, and what is the share of non-compliant products on the market?

	Very small (<5%)	Fairly small (5-10%)	Relatively small (11-20%)	Fairly significant (21-40%)	Very significant (>40%)	Do not know / No opinion
* Cleaning equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Construction equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Gardening equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Loading and lifting equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Power generators and cooling equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Pumping and suction equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Snowmobiles and snow groomers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Waste collection, processing and recycling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

46 Please explain:

500 character(s) maximum

* 47 Do you think that third party conformity assessment procedures (with the intervention of a notified body) contribute to ensure that only compliant products are placed on the EU/EEA market?

- Not at all. Internal control or production ("self-assessment") should be enough in any case
- To a small or moderate extent. Internal control of production ("self-assessment") should be the most widely applicable conformity assessment procedure
- To a large or very large extent. Internal control of production ("self-assessment") should be used in very few cases only or even removed as a conformity assessment procedure
- Do not know / No opinion

48 Please explain / specify:

500 character(s) maximum

* 49 Do you think that the implementation of the Directive cause excessive administrative burdens (information, collection and reporting of data, etc.)?

- Not at all. The administrative requirements of the Directive are adequate and proportionate
- To a small or moderate extent
- To a large or very large extent. The administrative requirements of the Directive are too heavy and mostly unnecessary
- Do not know / No opinion

50 Please explain / specify:

500 character(s) maximum

Options for change

* 102 Would you be in favour of converting Directive 2000/14/EC into a Regulation (which would then be directly and uniformly applicable in each EU/EEA country)?

- Yes
- No
- Do not know / No opinion

103 Please explain:

500 character(s) maximum

104 Directive 2000/14/EC could be aligned to the "[New Legislative Framework](#)" (in particular to [Decision No 768/2008/EC](#)). To what extent would you be in favour of the following changes which would be introduced by such alignment?

	Not at all	To a little extent	To a moderate extent	To a great extent	Do not know / No opinion
* Aligning definitions and terminology to the body of EU legislation on health and safety of products in the internal market	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Establishing more specific definitions and obligations on economic operators (manufacturers, authorised representatives, importers and distributors)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Establishing more specific requirements on conformity assessment bodies (notified bodies)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Defining specific procedures on market surveillance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Clarify the meaning, use and protection of CE marking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

105 Please explain:

500 character(s) maximum

BIBM doesn't believe that a revision is necessary and warn the Commission to not to increase administrative burden for companies. Over-regulating causes a lot of damage, unnecessary cost and time loss. Therefore BIBM calls the European Commission to be cautious and rather reduce existing burden.

* 106 Do you consider that the scope of Directive 2000/14/EC (in particular, the lists of equipment subject to noise limits and those subject to noise marking only in Articles 12 and 13 respectively) should be modified?

- No. The current scope is appropriate and the lists of equipment are complete and exhaustive
- Yes. The current scope is no longer adequate and the lists of equipment need to be updated
- Do not know / No opinion

* 110 Do you consider that the noise limits set by Directive 2000/14/EC should be modified?

- No. The current noise limits are reasonable and achievable, as well as adapted to the state of the art, so there is no need for change
- Yes. The current noise limits need to be updated according to the state of the art, and/or to make them more reasonable and achievable

Do not know / No opinion

* 116 Would you be in favour of changing the current marking system with a label indicating classes of sound power levels (as, for example, for energy efficiency class)?

- Yes. The current system is not appropriate to provide the necessary and useful information
- No. The current system is appropriate to provide the necessary and useful information
- Do not know / No opinion

117 Please explain:

500 character(s) maximum

* 119 Directive 2000/14/EC provides for four conformity assessment procedures (Annexes V to VIII). In your opinion, is there any need for change at that respect?

- Yes, by adding more conformity assessment procedures from the modules of [Decision No 768/2008/EC](#) to the current ones
- Yes, removing the conformity assessment procedures involving a third party ("notified body") and keeping the internal control of production procedure only
- Yes, but keeping the same procedures and just aligning them to the modules of [Decision No 768/2008/EC](#)
- No, the conformity assessment procedures are appropriate and should be kept as they are
- Do not know / No opinion

120 Please explain:

500 character(s) maximum

* 124 Do you think that the current status and use of standards as methods of measurement of airborne noise in Directive 2000/14/EC (noise test codes) should be modified?

- Yes. The current system is not appropriate to carry out the required measurements with respect to the state of the art
- No. The current system is appropriate to carry out the required measurements
- Do not know / No opinion

* 127 Do you think that the current requirements on collection of noise data (Article 16 of Directive 2000/14/EC) should be modified?

- Yes, the current system is not appropriate with respect to the requirements of the Directive
- No, the current system is appropriate and feasible
- Do not know / No opinion

[Document upload and final comments](#)

130 Please feel free to upload a concise document, such as a position paper.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

The maximal file size is 1 MB

131 If you wish to add further information - within the scope of this questionnaire - please feel free to do so here.

1000 character(s) maximum

Contact

Mario.GABRIELLI-COSSELLU@ec.europa.eu
