



FEDERATION EUROPEENNE DE LA MANUTENTION
Product Group
Industrial Trucks

FEM

A brief guide for identification of non-compliant industrial trucks
- marking of machinery, documents, instructions -

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Fédération Européenne de la Manutention (Product Group Industrial Trucks)

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1 Introduction

Industrial trucks placed on the EU market for the first time must comply with the relevant EU legislation - and meet all valid safety and environmental requirements. Machinery which does not fulfil these requirements is noncompliant and is not allowed to be placed on the EU market. This guideline is meant to help to easily distinguish between compliant and noncompliant machinery. It describes only those essential criteria which can be checked even without in-depth knowledge and technical information. Thus, this brochure is not meant to be comprehensive but is designed to act as an “early warning” tool. However, if one or more items are out of line with the criteria then it is likely that you have non-compliant equipment. The import of non-compliant industrial trucks into the EU, and its sale and use, remains a major problem for the European industrial trucks industry. It is a source of unfair competition and compromises bona fide suppliers’ ability to fund R&D. This in turn threatens the competitiveness of the European industrial trucks industry and the jobs it provides. Accidents with non-compliant machines are more likely to happen and they often do not meet the environmental standards demanded by the EU. Product Group Industrial Trucks of FEM, as the recognized organization representing and promoting European industrial trucks manufacturers and related industries, calls upon all responsible authorities and stakeholders to work together to rid the EU of non-compliant industrial trucks.

This guide represents so far only one of a series of guides dealing with non compliance of industrial trucks.

2 Scope

This guide deals with the non-compliance of industrial trucks with regards to marking of machinery, documents and instructions according to directive 2006/42/EC, 2000/14/EC and 2004/108/EC.

Requirements and examples described below are focusing on the specific requirements for industrial trucks powered by an internal combustion engine.

3 Marking of the Industrial Truck

All industrial trucks placed on the EU market must be marked clearly and permanently with specific information.

The placing on the European market is prohibited if the basic requirements are not met. This would be the case if the answer to any of the following questions is "No".

- Is the marking permanently affixed?
- Is the marking written in one of the official EU languages?
- Does the marking contain name and address of the manufacturer?
- If the Declaration of Conformity (DoC see below) mentions an EU representative, does the marking contain her/his name and address?
- Does the marking show the CE mark?

- Does the marking show the designation of the series, type or model?
- If the DoC (see below) contains a serial number (or range of serial numbers), does the marking show the identical serial number (or a serial number within the range) as specified on the DoC?
- Does the marking show the year of construction?
- Does the marking show the nominal power in kW?
- Does the marking show the weight of the machine in kg?

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Some examples of non compliant markings:

FOR SAFETY
Trained Operators Only
Know lift truck safety rules, operation and maintenance instructions contained in your owners and operators guide or available on request
CHECK OIL AND WATER LEVEL DAILY

TRUCK INFORMATION

Fleet no.	Model
Serial no.	
Attachment	
Approx. wt.	3240 kg
Back tilt	6 degrees
Tyre pressure bar	fr rear
Drive tread width	855 mm
Steer tread width	931 mm
Tyre size	650-10 fr 500-8 rear
Rated capacity with upright vertical equipped as above	4800 mm
Load height "A"	4800 mm
Maximum load at load centre "B"	1300 mm
	500 kg
	mm
	kg
	mm

Nominal power missing
Year of construction missing

CE

Capacities are for centered loads with listed attachments and/or forks with mast in the vertical position on a level working surface.

Model

Type **DIESEL**

Serials NO.

Attachments

MFG. Year **2010**

A	600 mm	mm
B	4005 mm	mm
C	600 mm	mm
Load Capacity	11000 kg	kg
Truck weight	16100 kg	kg

Nominal power missing

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4 Declaration of conformity (DoC)

All industrial trucks placed on the EU market for the first time must be accompanied by a "EC Declaration of Conformity" (DoC). The EC Declaration of Conformity for different directives may be separate.

The Declaration of Conformity is a critical document which shows which EU directives the machine complies with. The placing on the European market is prohibited if the basic requirements are not met. This would be the case if the answer to any of the following questions is "No".

- Is the (DoC) written in a Community language?
- Is at least one language version of the DoC written in the official EU language(s) of the member state in which it is used or to be used?
(This criteria can only be checked if the country where the machine is used or to be used is known.)
- Does the DoC contain a statement that the machine meets the requirements of the following EU directives:
 - 2006/42/EC – the Machinery Directive?
 - 2000/14/EC – the Directive on Noise Emissions in the Environment by Equipment for Use Outdoors?
 - 2004/108/EC – the Directive on Electromagnetic Compatibility?
- Does the DoC include the name and address of the manufacturer?
- If the marking on the truck (see above) mentions an EU representative, does the DoC contain her/his name and address?
- Does the DoC contain a description of the machine, e.g. "Industrial truck", "Fork Lift Truck"?
- Does the DoC include a serial number or a range of serial numbers?
- Does the DoC indicate name and address of the person who is authorised to compile the technical file?
- Is above address located within the EU?

The following requirements (from directive 2000/14/EC) are not applicable to those counterbalanced lift trucks specifically constructed for container handling:

- Does the DoC indicate name and address of the person who keeps the technical documentation on noise emissions?
(It is sufficient for the DoC to indicate only one person responsible for technical files without referring to the specific directives (2006/42/EC and 2000/14/EC).)
- Does the DoC contain the "measured sound power level" (L_{WA} in dB)?
- Does the DoC contain the "guaranteed sound power level" (L_{WA} in dB)?
- Is the indication of the guaranteed sound power level on the truck identical to the value given as "guaranteed sound power level" (L_{WA} in dB) in the DoC?
- Does the DoC contain date and place of the declaration?
- Does the DoC contain identity and signature of the person making the declaration?

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5 Instructions

Instructions on the safe use are a requirement of EU law and must accompany the industrial truck.

The placing on the European market is prohibited if the basic requirements are not met. This would be the case if the answer to any of the following questions is "No".

- Are the instructions supplied in paper form?
Provision of the same content in electronic form and/or on the internet is permitted only additionally.
- Do the words "Original instructions" appear on at least one of the instructions?
- Are all instructions marked either by the words "Original instructions" or "Translation of the original instructions"?
- Is at least one of the instructions written in the official EU language(s) of the member state in which the industrial truck is placed on the market or put into service?

- Do the instructions include name and address of the manufacturer?
- Are manufacturer's name and address, as specified on marking, DoC and instructions, identical to each other?
- Do the instructions include a repeat of the machine markings (with or without the serial number)?
- Do the instructions include a repeat of the main items of the Declaration of Conformity?

- Do the instructions either contain the "A-weighted emission sound pressure level" (L_{pA} in dB(A)) or the statement that L_{pA} doesn't exceed 70 dB(A)?
- Do the instructions either contain the measured value of whole body vibration (in m/s^2) or the statement that it doesn't exceed 0,5 m/s^2 ?
- Do the instructions either contain the measured value of hand-arm vibration (in m/s^2) or the statement that it doesn't exceed 2,5 m/s^2 ?