

About CECIMO

Since 1950, CECIMO helps European machine tool industries and related manufacturing technologies defining the strategy to improve its leadership and global competitiveness, and promoting its development in the fields of economy, technology and innovation.

Our Industry needs adequate legislation, skilled workforces, innovation, proper financing, good supply chains and infrastructures to keep its prominent position. CECIMO responds to this exigence by keeping up with these fast-changing times and focussing on, amongst others, globalisation, sustainability, market surveillance, lack of skilled labour force and a long-term industrial strategy.

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DEMONSTRATION ONLY



European Association of Machine Tool Industries and Related Manufacturing Technologies (CECIMO)

Description:

CECIMO is an umbrella organisation that serves the common interests and values of the European Machine Tool Industries and related Manufacturing Technologies at EU and global level.

Stakeholder(s):

European Machine Tool Industries

Mission

To serve the common interests and values of the European Machine Tool Industries and related Manufacturing Technologies

Values

Leadership: Technology

Innovation

Competitiveness: Competitiveness for companies and countries is their capacity to increase productivity on the long term, so their products and services contribute to the growth of the economy and return to the society.

Sustainability

Intellectual Property Rights

Data Protection

Regulatory Cooperation

1. Trade

Advocate for an open and fair trade

The European machine tool sector and related manufacturing technologies advocate for an open and fair trade, driven by bi- and multilateral trade and investment agreements that create a level playing field for the signatories, respect intellectual property rights and data protection, and facilitate regulatory cooperation between the parties.

1.1. Market Access

Support free and fair trade through cooperative measures

International market access — Our manufacturers need a high degree of trade certainty. CECIMO supports free and fair trade through cooperative measures over unilateral protectionist measures. For that purpose, a strong and modernized WTO should be able to guarantee not only a fairer playfield and market access rights to its members but would also create more efficient safeguard mechanisms through highly operational dispute settlement resolutions and stronger enforcement of WTO rules (IPR, mutual access etc.). In the context of improving market access and benefitting from an efficient trade defence system, we need a clear tariff and non-tariff framework that will also reduce the administrative burden for our exporters. That is why we should focus on cooperative actions, rather than retaliatory measures that further deteriorate existing trade relationships.

Stakeholder(s):

Manufacturers

WTO

1.2. Agreements

Follow EU negotiations for Free Trade and Investment Agreements

Free Trade and Agreements — CECIMO closely follows EU negotiations for Free Trade and Investment Agreements with EU's main third country trade partners.

Stakeholder(s):

Japan :

As of February 1st 2019, the EU-Japan Economic Partnership Agreement entered to force, which unlocked new opportunities for open and rule-based trade for trade two biggest world economies. CECIMO supports the deal, stressing that more needs to be accomplished in terms of reciprocity through a sound industrial policy. Removing barriers without promoting the machine tools made in Europe is not sufficient to support European manufacturers competitiveness in the global market.

US :

CECIMO endorsed the EU-US talks on a limited trade agreement focusing on industrial goods. The regulatory cooperation and the removal of non-tariff barriers in the planned trade deal between the EU and US is relevant, but it should be focused on industrial goods, to advance trade talks. Moreover, the removal of non-tariff barriers in the EU-US trade of AM solutions and the alignment of technical requirements between US and EU standards and regulations in conformity assessment procedures will benefit both sides.

1.3. Sanctions

Support our companies in their navigation through sanction regimes

CECIMO provides for its members market and political intelligence on a regular basis. An important part of this mission is supporting our companies in their navigation through sanction regimes.

Stakeholder(s):

Iran :

Based on the Joint Comprehensive Plan of Action (JCPOA) between Iran, the P5+1 and the EU, most of the sanctions on Iran were lifted by 2016.

US :

But due to US withdrawal from JCPOA in May 2018, US sanctions on Iran were reimposed, with the implication of cutting out business with any US allies that trade with Iran.

EU Businesses :

To circumvent these consequences for EU businesses, CECIMO continuously proposed several solutions based on our experience from the sector.

EU Exporters :

We are pleased that Germany, France and UK established a special purpose vehicle with a sovereign shield – the Instrument in Support for Trade Ex-

changes (INSTEX) – to safeguard the deal and protect EU exporters by facilitating legitimate financial transactions of EU businesses with Iran in compliance with JCPOA provisions.

Germany

France

UK

Russia :

Both US and EU have imposed sanctions on Russia, a very important trade partner for European machine tool builders. CECIMO has underlined the negative impacts on our strategic industrial assets and voiced that a solution is needed to prevent further damage on European advanced manufacturing.

1.4. Tariffs

Define a tariff code for AM machines

Tariffs on AM — The Harmonized System (HS) is an international nomenclature for the classification of products. The system is used by more than 200 countries and economies as a basis for their Customs tariffs and for the collection of international trade statistics. Over 98 % of the merchandise in international trade is classified in terms of the HS. The lack of a standalone, specific tariff code for AM machines makes tracking their trade across boundaries more difficult, thereby hindering the ability to understand truly the growth of this technology world-wide.

Stakeholder(s):

European Commission :

CECIMO cooperated with the European Commission on the definition of the code, and in 2019 international WCO partners should decide whether to accept the Commission-proposed classification. If the

proposal is accepted, the classification for Additive Manufacturing machines will be part of the tariff harmonised system from 2022.

1.5. FDI

Screen foreign direct investments (FDIs) as a voluntary cooperation framework.

Foreign Direct Investment — FDI can be defined as an investment made by an entity in one economy to obtain lasting interest in an enterprise located in another economy. FDI can be a key driver of competitiveness and economic development and a great source of employment and growth in an open economy. In return, it also established effective control of foreign business assets, and a certain degree of influence on the decision-making of the foreign business. However, the openness to foreign investments should be mutual. EU companies should have equal opportunities to acquire ownership in third country companies, just as their third country competitors.

Stakeholder(s):

EU :

CECIMO welcomes the current proposal of an EU framework for screening foreign direct investments (FDIs) as a voluntary cooperation framework. We strongly believe that security and public order are sovereign competences and should remain as such. An additional EU FDI screening level, as initially

foreseen in the EC proposal, would have posed the risk of a disproportionate administrative burden for our companies, leaking commercially sensitive information and discouraging FDI into the EU in the longer run.

1.6. Dual-Use Exports

Oppose controls going beyond the control lists.

Dual-use export control — The current regulation on dual-use export controls reflects the international commitments of EU in multilateral accords on export controls.

Stakeholder(s):

European Commission :

The European Commission is currently reviewing the regulation. CECIMO welcomes the proposal in the sense that it aims to further harmonise regulatory framework across the Single Market. However, we strongly disagree with the introduction of additional controls going beyond the control lists, such as catch-all clauses, and the requirement for businesses to act in “due diligence” when verifying the end-user, therefore enlarging the scope of the applicable controls. These measures create grey areas and entail more legal uncertainty for businesses. Shifting the responsibility of protecting human rights and preventing terrorism to the private sector puts risk avert

exporters at a competitive disadvantage in respect with other business operators that might comply with laxer export controls.

UK :

Given the increased risk of a no-deal Brexit, the new status of the UK, as a very important trade partner for the EU27, will need to be decided in the most suitable way for businesses on both sides of the canal. Therefore, CECIMO endorses the European Commission’s proposal to include the UK in the list of lower risk countries, as it already complies with all international accords for dual-use goods.

2. Sustainability

Support long-term sustainability.

The machine tool industry and related manufacturing technologies already operate as a responsible industry supporting long-term sustainability. The sector contributes to the circular economy through different actions aiming at improving the performance of its products, developing and implementing new technologies. Continuous performance improvement, maintenance, upgrading, refurbishing and recycling are already common practices in the sector.

2.1. Circular Economy

Minimize waste and optimize the use of goods and materials.

The concept of circular economy refers to an economy where the use of goods and materials is optimized, and waste is eliminated or minimized. Resources are kept in use for as long as possible and at the end of the product lifecycle, resources are recovered to regenerate products and materials that can be used again to create further value. CECIMO published a report that shows how our sector is contributing to the circular economy. To implement these principles, our companies invest in new technologies, share best practices and work on global standards. Also, policy makers can help by setting the right framework for our industry to take on this challenge, i.e. support digitisation and R&D. You can also watch the animated video – here on the left side – that summarizes the main points.

2.2. Ecodesign

Develop standards for the environmental evaluation of machine tools.

Ecodesign Directive — Energy efficiency is an important aspect for machine tools and related manufacturing technologies.

Stakeholder(s):

European Commission :

Machine tools were one of the product groups considered by the European Commission for the development of a Regulation establishing requirements under the Ecodesign Directive.

Welding Equipment Manufacturers :

Finally, the Regulation will only cover welding equipment but the possible inclusion of requirements for machine tools will be re-examined in the future.

ISO :

The industry is currently working on the development of standards for the environmental evaluation of machine tools (ISO 14955 series) under ISO/TC 39.

Machine Tool Manufacturers :

This standard establishes a framework for the improvement of the environmental performance of machine tools taking into account the real needs, technological possibilities and economic environment of the sector at international level.

2.3. Blue Competence

Adopt sustainable practices in line with the Blue Competence criteria/principles.

Blue Competence Initiative — Originally the main focus of the initiative was energy efficiency. In January 2018 the initiative was revamped to include sustainability in general and a new set of rules was also established. Participant companies using the Blue Competence trademark show their commitment to adopting sustainable practices in line with the Blue Competence criteria/principles.

Stakeholder(s):

Germany :

Blue Competence is a sustainability initiative originally launched in Germany for the entire mechanical

engineering industry. In 2012, CECIMO brought this initiative at European level.

Mechanical Engineering Industry

3. Market Surveillance

Check whether products meet the applicable requirements.

The European Union (EU) internal market assures the free movement of goods, services, capital and persons since 1993. To freely circulate within the single market, goods need to conform to the requirements of European legislation. By including the CE marking to a product, a manufacturer declares that the product meets all the relevant legislation. Market surveillance, this is, checking whether products meet the applicable requirements, is also crucial for the smooth functioning of the internal market.

3.1. Machinery Legislation

Promote the free movement of machinery and keep a high level of protection for EU workers and citizens.

EU Machinery Legislation ... CECIMO has been actively contributing to the impact assessment study which will collect evidence on different issues that might call for a revision.

Stakeholder(s):

European Machine Tool Manufacturers :

European machine tool manufacturers need to comply with the Machinery Directive 2006/42/EC, which aims at promoting the free movement of machinery and keeping a high level of protection for EU workers and citizens.

EU Workers

EU Citizens

European Commission :

The Directive is currently being evaluated by the European Commission (EC), especially in the light of new technological developments and their possible impact on the safety of users. After launching the

inception impact assessment in 2018, the EC is now carrying out the impact assessment, which should be finalised in February 2020.

Machine Tool Sector :

CECIMO sees potential benefits in aligning the Directive with the 'New Legislative Framework' and in converting it into a Regulation. Nevertheless, the machine tool sector considers that the essential health and safety requirements of the Directive already provide the necessary framework to ensure that safe products, including new technologies such as Artificial Intelligence (AI), are placed on the market. There is no need then to introduce changes in the Directive's essential requirements.

3.1.1. Digital Documentation

Support digital documentation.

CECIMO also supports digital documentation. There are many advantages in the use of digital manuals both for manufacturers and users including the possibility of easier updates, better searchability and usability, reduction of printing costs and environmental impact. We believe this is already possible under the current Directive, but we would welcome some further clarification e.g. in the Guide to the Machinery Directive. You can read more in the position paper published at the beginning of 2019, in our reply to the public consultation and in the summary of a CECIMO briefing.

3.2. Standards

Define the state of the art and update standards to respond to new technological developments.

One of the means to comply with the requirements set by EU legislation is the use of harmonised standards. Standards define the state of the art and updating them is the best method to respond to new technological developments, rather than changing the essential requirements of Directives. CECIMO is actively involved in standardisation activities affecting the Machine tool and related manufacturing technologies sector: • ISO/TC 39

on Machine Tools • ISO/TC 184/SC 1 on Physical device control • ISO/TC 261 on Additive Manufacturing • ASTM F42 on Additive Manufacturing

Stakeholder(s):

MSP/DEI Commission :

CECIMO has participated actively in the MSP/DEI Commission Working Group on Standards for Digitising European Industry which aimed at mapping existing standards, identifying needs and providing a roadmap to foster standardisation in support of the digitalisation of European industry.

Working Group on Standards for Digitising European Industry

ASTM AM Center of Excellence :

CECIMO is also a member of the Advisory Board for the ASTM's AM Center of Excellence.

3.3. CE Marking

Publish guidelines for CE marking providing a quick check-list to help conformity assessment.

Guidelines for CE Marking — Manufacturing equipment is often complex, and too large and expensive for lab testing. This means it is difficult to determine on-site if the design is compliant with safety regulations. To support market surveillance and customs authorities in their controls, CECIMO publishes guidelines for CE marking providing a quick check-list to help conformity assessment. The guidelines can also help to raise awareness among economic operators, importers, dealers and end-users about European safety requirements and encourage responsible purchase behaviour.

3.4. Enforcement & Compliance

Create a level playing field.

Regulation on enforcement and compliance — The non-enforcement of EU regulations creates unfair competition and undermines the competitiveness of those economic operators who do comply with the rules. That's why effective market surveillance is essential to create a level playing field, which encourages competition centred around high health and safety standards, and not as a race to the bottom at the expense of these standards.

Stakeholder(s):

EU :

The EU has proposed a "Regulation on compliance and enforcement", which establishes additional requirements in order to strengthen market surveillance and improve cooperation between all relevant actors.

CECIMO supports the overall aim of the regulation but finds that some provisions could create additional burden to companies.

3.5. IPR & Liability

Avoid over-regulation and focus on technical solutions driven by market demands.

Intellectual Property Rights and Product liability — Industrial IPRs aim, among their different objectives, at protecting inventions, designs and advancement in technology, thus stimulating investments in research and advancement of new technologies. The European Union is looking at the suitability of the existing regulatory framework on IPR and product liability in relation to the emergence of new technologies such as additive manufacturing. CECIMO, as association representing Additive Manufacturing at European level, is stressing the risk of over-regulation and focussing the legislator attention on technical solutions driven by market demands.

3.6. Worker Postings

Set rules regarding the terms and conditions for employees sent by their employers to perform a service in another EU member state on a temporary basis.

Posting of workers Directive — The Posting of workers Directive sets mandatory rules regarding the terms and conditions for employees sent by their employers to perform a service in another EU member state on a temporary basis. CECIMO welcomes the policy objective of the Commission, i.e. to ensure fair wages and guarantee a level playing field between posting and local companies throughout the EU. Nevertheless, the revised Directive introduces several legal and bureaucratic elements which discourage SMEs from posting workers, especially when those requirements differ among EU member states.

3.6.1. Assembly & Installation

Ensure Member states correctly implement the exception allowed by the current Posting Directive for initial assembly and/or installation, as well as postings for all short-term operations.

CECIMO calls for the European Commission to ensure Member states correctly implement the exception allowed by the current Posting Directive for initial assembly and/or installation, as well as postings for all short-term operations.

Stakeholder(s):

European Commission

3.6.2. Reporting Requirements

Agree on common reporting requirements for posted workers at European level.

Another step in the right direction would be to agree on common reporting requirements for posted workers at European level and the same kind of documents to be submitted in all member states in English.

3.6.2.1. Uniformity & Language

Provide for the same kind of documents to be submitted in all member states in English.

4. Skills

Address the skills gap impacting many European industries.

Stakeholder(s)

Additive Manufacturing Sector :

Additive Manufacturing is a sector particularly touched by skills gap. That's why CECIMO has worked and works on different EU-funded projects on AM under Erasmus +:

European Commission :

CECIMO is member of the "Digital Skills and Jobs Coalition", an initiative launched by the European Commission.

Digital Skills and Jobs Coalition :

The Coalition aims at building strong partnerships and working together to reduce digital skills gaps in Europe by 2020. Among the different objectives, members of the coalition support the up-skilling and retraining of the workforce for new digital technologies. If you want to know more, visit the EC website.

European Industries

Human capital is fundamental to every economic activity. The current technology revolution in manufacturing urges people to possess a wide range of skills, from vocational and technical to entrepreneurial and transversal. The skills gap is increasing and impacting on many European industries, including machine tool industries and related manufacturing technologies, which are not able to find enough personnel up to the tasks required.

4.1. Education, Training & Apprenticeships

Invest in education, training and apprenticeships.

It is not just a problem of finding the right skills. SMEs in particular lack the resources to invest in costly training programmes in breakthrough new technologies.

Stakeholder(s):

EU Member States :

Member states should invest more in education, training and apprenticeships to prepare the workforce for future jobs and cooperate with industry to design and deliver a new educational approach that merges various disciplines.

EU :

The EU should boost funding for SMEs to allow them to participate in training solutions provided in the market.

SMEs

4.2. Job Profiles & Competencies

Promote a common understanding of emerging job profiles and related competences around innovative technologies.

The EU should support the promotion of a common understanding of emerging job profiles and related competences around innovative technologies, such as additive manufacturing. This harmonized understanding of jobs and tasks will facilitate the allocation of human capital resources in the industry, while also boosting the mobility of additive manufacturing workforce across the EU. It will also foster the formalization of skills acquired in an informal environment.

4.3. Events & Conferences

Organise events and conferences to raise the issue among EU stakeholders.

CECIMO organises events and conferences to raise the issue among EU stakeholders. The last CECIMO event was the "Skills4Industry" Roundtable.

5. Competitiveness

Promote the manufacturing competitiveness of our industry.

CECIMO, as representative of the machine tool industry and related manufacturing technologies, promotes the manufacturing competitiveness of our industry, which has always been investing in digitisation, sustainability and innovation, and therefore contributing to the EU economy. At the same time, the EU should set favourable conditions for our sector to perform at its best and define a forward-looking industrial strategy.

5.1. Industrial Policy

Since the Competitiveness Council asked the European Commission for a thorough and forward-looking EU industrial policy strategy in 2017, CECIMO has been greatly contributing to the EU debate.

Stakeholder(s):

EU Decision Makers :

CECIMO has been actively involved in all major public debates, such as the EU Industry Days and has been constantly calling on the EU decision makers to deliver the right framework conditions for the EU industry to be a leader on the global stage.

Industry4Europe Coalition :

CECIMO also joined the Industry4Europe Coalition, a large and unprecedented coalition of 138 EU Industry Associations, to campaign in one voice and to help set a long-term vision for the EU's industrial and manufacturing strategy.

EU Industry

EU Industry Associations

5.1.1. Governance & Transparency

Improve governance and transparency.

We need improved governance and transparency... The EU Industry Day and the High-Level Industrial Roundtable "Industry 2030" are very important steps towards transparency and accountability, therefore all interested stakeholders should have access to information on the progress of the discussion.

Stakeholder(s):

European Commission :

The European Commission should work closely with the Member States and industry.

5.1.2. Market Failure

Limit legislation to instances of market failure.

A business-friendly environment gives the necessary certainty to businesses for them to invest in skills, innovation and to adapt to trends of emerging technologies, global competition, the low-carbon economy and so on.

Stakeholder(s):

EU Policymakers :

EU policymakers should only legislate where market failure exists.

5.2. Collaborations

5.2.1. Knowledge & Engagement

Create a knowledge community and increase the engagement of industrial stakeholders of the manufacturing sector.

Stakeholder(s):

Manufuture :

CECIMO is also part of Manufuture, a platform that aims at creating a knowledge community and increasing the engagement of industrial stakeholders of the manufacturing sector. In December 2018 the High-Level Group produced its 2030 Vision for a

competitive, sustainable and resilient manufacturing, that will lead to the next revolution.

Industrial Stakeholders

Manufacturing Sector

5.2.2. Meetings & Conferences

Organize high level meetings and conferences that gather together EU representatives and the manufacturing industry.

Stakeholder(s):

European Forum for Manufacturing :

Last but not least, CECIMO is member of EFM, the European Forum for Manufacturing. Through this partnership, we organize high level meetings and conferences that gather together EU representatives

and the manufacturing industry. (link to policy dinner debate report)

EU Representatives

Manufacturing Industry

Administrative Information

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