

Position Paper

Position Paper on the Non-Submission of the Latest Editions of EN 60335-2-69, 2-68, 2-67, 2-79 and 2-124 for Harmonisation

1. Introduction

EUnited Cleaning represents the leading manufacturers of floor cleaning machines and high-pressure cleaners for commercial and industrial use. It represents the interests of its members in all economic and technical matters with politicians, legislators, customers, research and education, trade fair companies, the press and the public. Members of EUnited Cleaning in support of this document are, in alphabetical order: Alfred Kärcher SE & Co. KG, Bosch Lawn & Garden, Comac S.p.A., Delfin Vacuums, Diversey Europe BV, Dulevo, FIMAP S.p.A., G. Staehle GmbH & Co. KG Columbus Reinigungsmaschinen, Ghibli S.p.A., Hako GmbH, IP Cleaning S.r.l., Lionsbot, Nilfisk A/S, Numatic International Ltd., RCM S.p.A., Ruwac Industriesauser GmbH, SPRINTUS GmbH, Stolzenberg GmbH & Co. KG, Tennant Europe N.V., Truvox International Ltd., TTS Cleantec GmbH, von Oertzen GmbH, Wetrot AG.

This position paper explains why EUnited Cleaning and its members have jointly decided not to submit the latest editions of the following safety standards for harmonisation under the EU Machinery Regulation (Regulation (EU) 2023/1230) ahead of its date of application on 20 January 2027:

- EN 60335-2-67: 2026* — Household and similar electrical appliances – Safety – Part 2-67: Particular requirements for floor treatment machines for commercial use
- EN 60335-2-68:2026* — Household and similar electrical appliances – Safety – Part 2-68: Particular requirements for spray extraction machines for commercial use
- EN 60335-2-69:2026* — Household and similar electrical appliances – Safety – Part 2-69: Particular requirements for wet and dry vacuum cleaners, including power brush for commercial use
- EN 60335-2-72:2026* — Household and similar electrical appliances – Safety – Part 2-72: Particular requirements for floor treatment machines with or without traction drive, for commercial use
- EN 60335-2-79: 2026* — Household and similar electrical appliances – Safety – Part 2-79: Particular requirements for high-pressure cleaners and steam cleaners

- EN 60335-2-124: 2026* — Household and similar electrical appliances – Safety – Part 2-124: Particular requirements for commercial dry ice blasting machines

These standards represent the latest state of the art, having been technically revised over the past decade to incorporate updated safety concepts, improved test methods, and consistency with their latest IEC counterparts published in 2021.

2. Rationale for Not Submitting These Standards for Harmonisation

2.1 Structural Delays Caused by the HAS System

The Harmonised Standards (HAS) assessment system, introduced under Regulation (EU) 1025/2012, requires detailed scrutiny by HAS consultants. While the system aims to ensure legal alignment with EU legislation, in practice it leads to significant procedural delays. These delays arise primarily from:

- Lengthy assessment cycles with multiple back-and-forth rounds between CENELEC working groups and HAS consultants.
- Varying interpretations of essential requirements, often requiring revisions that do not improve safety but create administrative burden.

Given current timelines, it is evident that these standards would not complete the HAS process before the Machinery Regulation becomes applicable on 20th January 2027. A delayed harmonisation process would risk creating a regulatory vacuum for manufacturers who rely on the newest editions.

2.2 Risk of Unnecessary Divergences Between EN and IEC Standards

Experience with previous HAS processes shows that HAS comments often demand wording changes that:

- Deviate from the corresponding IEC 60335 series,
- Create technical discrepancies without added safety benefit,
- Reduce international alignment, increasing burdens for globally operating manufacturers.

Given that EN 60335-2-69, -2-68, -2-67, -2-72, -2-79 and -2-124 are based on their IEC counterparts and incorporate only European modifications, additional forced deviations would undermine coherence. This is not feasible for an export-oriented industry.

3 Advantages of Immediate Publication Without Harmonisation

3.1 Immediate Availability of the State of the Art in the EU Market

The Machinery Regulation requires manufacturers to apply state-of-the-art. Once published by CENELEC, these standards constitute the state of the art, regardless of harmonisation status. Publishing the EN versions immediately, without delaying their availability due to HAS assessment cycles, ensures:

- Clear, updated, and technically sound safety benchmarks,
- Predictable compliance expectations for manufacturers,
- A fully aligned European market with access to the most recent safety knowledge.
- Minimal divergence from IEC standards minimizes 3rd party certification costs

3.2 Legal Certainty for Manufacturers

Even without harmonisation, compliance with the latest EN standards provides:

- Safety standards reflecting the legally required state of the art,
- A defensible basis in technical documentation and risk assessment,
- Reduced legal uncertainty during market surveillance or conformity assessments.

Thus, the lack of harmonisation does not prevent manufacturers from using these EN standards as authoritative references.

3.3 Avoidance of Procedural Bottlenecks

Refraining from submitting these editions for harmonisation:

- Prevents **needless delays** for manufacturers waiting for updated standards,
- Mitigates the risk of **diverging EN/IEC technical content**,
- Ensures faster and more efficient deployment of the updated safety provisions

4 Possibility of Subsequent Harmonisation

EUnited Cleaning explicitly recognises that harmonisation remains possible at a later stage. Once the HAS system becomes more predictable or more consistent across consultants, a future harmonisation cycle may be initiated without jeopardising:

- The technical integrity of the standards,
- The alignment with international norms,
- Market availability of the latest safety provisions.

This staged approach ensures the best balance between regulatory compliance and technical consistency.

Conclusion

EUnited Cleaning and its members unanimously agree that the immediate publication of the latest EN 60335-2-69, -2-68, -2-67, -2-72, -2-79 and -2-124 without prior harmonisation is the most effective strategy to guarantee:

- Availability of the latest safety requirements,
- Legal certainty for manufacturers,
- Market readiness ahead of the Machinery Regulation's application,
- Avoidance of avoidable fragmentation and delays linked to the HAS process.

EUnited Cleaning remains committed to supporting European standardisation, to cooperating with legislators, and to ensuring a high level of safety, competitiveness, and innovation in the cleaning machinery sector.

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EUnited is the European association representing manufacturers of municipal equipment, professional cleaning machines and vehicle wash systems. It brings together more than 60 member companies in 16 European countries.

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