

For the attention of:

Mr Massimo Sessa Consiglio Superiore dei Lavori Pubblici Servizio Tecnico Centrale
Mr Mariacangela Ramundo Consiglio Superiore dei Lavori Pubblici Servizio Tecnico Centrale
Mr Giuseppe Fabbri: Chairman of CEN TC 344, Technical Advisor AISEM
Mr Eugen Talmann: President of FEM Racking and Shelving
Mr Colin Hinton: Secretary General: FEM Racking and Shelving

Cc:

Board Members of FEM Racking and Shelving
Member Contacts of FEM Racking and Shelving

Brussels, 30 October 2023

Dear Sirs,

FEM, the European Materials Handling Federation, would like to draw your attention to a specific issue raised by the FEM Racking and Shelving (R&S) Product Group in their letter addressed to you, dated 13 October 2023. The issue concerns the decision of the Italian public authorities to introduce local requirements which are not in accordance with the EN 16681:2016 Steel Static Storage Systems – Adjustable pallet racking systems – Principles for Seismic Design.

We are concerned about the potential divergences that this recent development may trigger amongst the EU Member States, which negatively impact the functioning of the Single Market as a whole. Therefore, FEM reaffirms the following core principles and messages that have been laid down in the letter of FEM Racking and Shelving Product Group.

First and foremost, EN standards, when available and used, ensure a level playing field for manufacturers, by providing the state-of-the-art, which reduces technical barriers to trade and therefore, facilitates the free movement of goods. In this specific case, EN 16681 is the state-of-the-art standard for the racking market and the main reference document for designers/structural engineers for the seismic design of Adjustable Pallet Racking in Europe.

Secondly, imposing local requirements, such as the LINEE GUIDA PER LA PROGETTAZIONE, ESECUZIONE, VERIFICA E.MESSA IN SICUREZZA DELLE SCAFFALATURE METALLICHE' document, leads to deviations from the EN standard in question, contributing to disruptions in the Italian racking market, which negatively impact on manufacturers, including Italian manufacturers who are burdened by diverging requirements between the Italian market and the rest of Europe.

FEM reiterates the request of the FEM Racking and Shelving Product Group not to continue with the publication of the abovementioned document and instead, propose a discussion within CEN TC344 to assess whether an amendment of the EN standard in question is required or not.

Yours sincerely,



Olivier Janin
FEM Secretary General