Report on the NOMAD pre-market surveillance exercise regarding noise information in sales literature of machines

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baua: Focus

This report, prepared by the NOMAD Task Force and presented to the Machinery ADCO in June 2023, focuses on a pre-market surveillance exercise conducted as part of NOMAD Phase 3. The NOMAD (NOise MAchinery Directive) Project aims to assess and improve the quality of noise information provided by machinery manufacturers in sales literature and instruction manuals of machinery in accordance with Directive 2006/42/EC. This premarket surveillance exercise examined the compliance of noise information in sales literature that machinery manufacturers have to provide in compliance with EHSR 1.7.4.3, if the sales literature contains the performance characteristics of the machine. The study investigated 85 samples of sales literature and 45 instruction manuals collected in five EU Member States.



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1 Executive Summary

This report, prepared by the NOMAD Task Force, focuses on a pre-market surveillance exercise conducted as part of NOMAD Phase 3. The NOMAD (NOise MAchinery Directive) Project aims to assess and improve the quality of noise information provided by machinery manufacturers in sales literature and instruction manuals of machinery in accordance with the requirements of the Machinery Directive 2006/42/EC.



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The NOMAD Project so far comprises three phases: Phase 1, conducted from 2008 to 2012, revealed that 80 % of the more than 1500 analysed instruction manuals did not comply with the Essential Health and Safety Requirement (EHSR) 1.7.4.2 u) regarding noise information in the instruction manuals. Phase 2, conducted from 2013 to 2019, resulted in the publication of a Guide for manufacturers of machinery and a Guide for users and buyers of machinery as well as the Phase 2 Report, which contained many recommendations to improve the situation and ideas for a NOMAD Phase 3, starting in 2021.

As a part of NOMAD Phase 3, this pre-market surveillance exercise examined the compliance of noise information in sales literature that machinery manufacturers have to provide in compliance with EHSR 1.7.4.3, if the sales literature contains the performance characteristics of the machine. This requirement emphasizes the need for consistency between sales literature and instruction manuals in terms of noise information.

The study investigated 85 samples of sales literature and 45 instruction manuals collected in five EU Member States. The exercise had limitations, as the sample size was small and therefore could not be representative of the entire market. Nevertheless, it provided an initial impression of the compliance, which was the aim of the exercise.

Observations from the exercise revealed variations in the layout and structure of sales literature, which primarily focuses on commercial aspects rather than technical details such as noise emission values. Some manufacturers provided no noise information in their sales literature, while others included it on their websites or through links to technical data sheets or instruction manuals.

The faults found in sales literature were similar to those identified in the original NOMAD survey (NOMAD Phase 1), including the absence of noise information, confusion between noise emission and noise exposure quantities, incorrect notations and terminology, and missing noise emission quantities required by the Machinery Directive. In total, about 62 % of the samples of sales literature that could be judged regarding EHSR 1.7.4.3 did not comply with it.

Furthermore, the analysis of the 45 collected instruction manuals revealed that problems with their compliance with EHSR 1.7.4.2 u) remain. In this pre-market surveillance exercise, about 42 % of the instruction manuals did not comply with this requirement which hints at an improvement of the compliance since NOMAD Phase 1 (80 % non-compliance), but is still far from an ideal 100 % of compliance.

Although the results are not statistically significant, they indicate potential issues with the overall compliance of noise information with legal requirements, in both, sales literature and instruction manuals. The results emphasize the need for improved noise information in sales literature to effectively implement the "Sell and Buy Quiet" strategy. To that end, the report provides recommendations for a possible dissemination to relevant stakeholders by the Machinery ADCO.

2 Introduction

2.1 The three phases of the NOMAD (NOise Machinery Directive)

The NOMAD project is about the quality of noise information provided by machinery manufacturers in the context of the application of the Machinery Directive (MD) [1]. It comprises three phases.

Phase 1 of NOMAD [2] is a wide enquiry about the quality of the information on noise provided by machinery manufacturers in the instruction manuals of the machines they put on the European market. It extends over the period 2008 – 2012. The main result of the enquiry is

that 80 % of the 1 500 instruction manuals analysed do not comply with Essential Health and Safety Requirement (EHSR) 1.7.4.2 u) of the MD that is specific to the information on noise that manufacturers must place in the instruction manuals.

The need to correct this worrying situation led Machinery-ADCO to launch a Phase 2 of NOMAD. It was conducted from 2013 till 2019 by the NOMAD Task Force. The operation consisted of eight actions targeting the main stakeholders involved (machine manufacturers, machine users, national authorities, health and safety at work experts, notified bodies etc.). Two major achievements were the publication of a Guide for manufacturers [3] and a Guide for users [4]. It also emerged clearly from discussions that the NOMAD exercise is actually part of the "Sell and Buy Quiet" strategy, of which European legislation i.e. the Machinery Directive is the backbone. All findings, thoughts and perspectives for further actions are to be found in the NOMAD Phase 2 Report [5]. In 2021, following a proposal by NOMAD Task Force, Machinery – ADCO decided to go on with a Phase 3 of NOMAD.

The pre-market surveillance operation described hereafter is part of NOMAD Phase 3. It is a survey about the quality of noise information in sales literature that machinery manufacturers provide their potential clients with.

2.2 Why carry out a pre-market surveillance exercise on sales literature?

The essential health and safety requirement (EHSR 1.7.4.2 u) of the MD is focused on the information on noise that manufacturers must provide in the instruction manuals of their machines. NOMAD Phases 1 and 2 were focused on the practical implementation of this EHSR.

However, when the MD was revised in the years 2000, a brand new EHSR 1.7.4.3 about the provision of information on noise (all emissions actually) in the sales literature of machines was introduced. This new requirement was the missing link in the strategy for implementing the "Sell and Buy Quiet" concept in practise. The information on noise provided by manufacturers in instruction manuals is available to users only once they have bought a machine, which is too late to take the information on noise as a purchase parameter. The "Sell and Buy Quiet" strategy can only be effective if the technical information on noise emission provided in the instruction manuals and in the sales literature is of good enough quality. NOMAD Phase 1 enquiry showed the poor quality level of instruction manuals for noise, which triggered the corrective actions performed in NOMAD Phase 2.

Logically, a new full enquiry 12 years after the first one (NOMAD Phase 1) should have been carried out in order to assess progress made. Resources available did not make it feasible and, following a proposal made by NOMAD TF, Machinery - ADCO decided to carry out a limited-scale action based on sales literature picked up on manufacturer websites.

2.3 EHSR 1.7.4.3 regarding information on emissions in sales literature

This EHSR demands that "Sales literature describing the machinery must not contradict the instructions as regards health and safety aspects. Sales literature describing the performance characteristics of machinery must contain the same information on emissions as is contained in the instructions."

The purpose of this pre-market surveillance exercise was to assess the compliance with this EHSR of a limited number of randomly selected samples of sales literatures picked up on manufacturer websites.

2.4 EHSR 1.7.4.3 in the Guide to the Application of the Machinery Directive

Since the text of EHSR 1.7.4.3 itself is very general, we refer to the following quote from the European Commission's Guide to the Application of the Machinery Directive [6, p. 270]: "§275 Sales literature.

While the instructions provided with the machinery are primarily intended to ensure safe use of the machinery, sales literature has a principally commercial function. However, section 1.7.4.3 requires that the instructions and commercial documents relating to the machinery be consistent. This is particularly important with respect to the intended use of the machinery referred to in section 1.7.4.2 (g), since users are likely to choose machinery for their purposes on the basis of sales literature.

The second sentence of section 1.7.4.3 is intended to help users to choose machinery with reduced levels of emissions of noise, vibrations, harmful radiation or hazardous substances. In particular, the values included in the noise emission declaration required by EHSR 1.7.4.2 (u) and the information on vibrations required by sections 2.2.1.1 and 3.6.3.1 must be included in commercial documents giving the performance characteristics of the machinery. Many sales brochures or catalogues include a section or table giving the principle performance characteristics of the machinery such as power, speed, capacity, production rate and so on, to enable potential customers to choose machinery appropriate to their needs. This section is the appropriate place to include the required information on emissions. [...]"

The compliance of sales literatures picked up on Internet was assessed based on EHSR 1.7.4.3 itself and the explanatory text (see above) from the Guide to the Application of the MD [6].

The pre-market surveillance exercise regarding noise information in sales literature of machinery

3.1 Scope

The study comprised the investigation of 85 samples of sales literature collected online in five different member states. Where possible, the instruction manuals were also collected. In total, 45 instruction manuals were collected and investigated.

3.2 Limitations of this study

This pre-market surveillance exercise did not aim at reaching a representative result for the whole market of machinery in the EU. The sample size of 85 is way too small and the individual samples were not selected to obtain a sample that is representative of the whole market.

3.3 Objectives

Considering the limitations, explained in Sec. 2.2, this pre-market surveillance exercise aims to get an idea of the compliance of machinery manufacturers regarding EHSR 1.7.4.3 Sales literature, i.e. does sales literature of machinery, describing the performance characteristics of machines, include the same noise information as the instruction manual (emission sound pressure level, sound power level, etc.). It does not claim to have the same statistical strength as the original NOMAD survey [2] and can only provide a first impression of the compliance with this requirement. As an additional benefit, this pre-market surveillance exercise also provides an impression of the current compliance of the instruction manuals with EHSR 1.7.4.2 u) that was checked in the original NOMAD survey.

3.4 Participants

Five member states participated in this pre-market surveillance exercise: France, Germany, Spain, Sweden and the Netherlands. While all were involved in collecting samples from websites in their languages, the samples were analysed by the French and German members of the TF.

3.5 Methods

3.5.1 Sample collection

The participants agreed on the following procedure for the sample collection:

- Search the web for sales literature on at least 15 different, preferably Annex IV machines, preferably from different manufacturers and register if noise information is provided or not. As far as possible, participants will gather sales literature of machines manufactured in his or her country or with the authorized representative located in his or her country.
- "Print" a pdf of the information on performance characteristics and noise found in each piece of sales literature directly from the browser.
- If available: Download the instruction manual and technical data sheets as a pdf.
- Make a single file (e.g. zip-archive) gathering all information for each machine (a set of pdf documents) and send it by e-mail to all participants.
- Fill in the 1st part of the assessment grid (Excel-file, see Appendix A.1) devoted to the information on the manufacturer, the machine identification, the components of the sales literature you collected and comments of your own, if any. This task does not require any competence in acoustics.
- The 2nd part of the grid (analysis of noise information in the gathered sales literature) will be filled in by the French and German members of the TF.

The final analysis of the whole sample of 85 machines was performed by the French and German members of the NOMAD TF. For that purpose, the data from the filled templates was collected in one Excel-file. Then the compliance with EHSR 1.7.4.3 and EHSR 1.7.4.2 u) was evaluated. The possible answers were:

- Met
- Not met
- · Cannot be judged

Unfortunately, due to the unavailability of the instruction manuals, the compliance could not be judged in many cases.

3.5.2 Definition of sales literature

Although the clear definition of sales literature in the context of EHSR 1.7.4.3 is probably a complex legal issue, considering the available resources, the NOMAD TF agreed on the following pragmatic definition: A website, either operated by the manufacturer or a distributor which presents/advertises a machine and provides performance data for this machine was considered as sales literature.

3.5.3 How to evaluate the compliance with EHSR 1.7.4.3

Regarding the provision of noise information, the following, broad-minded approach was used: A manufacturer or distributor who provides noise information directly on the website, in the form of a technical data sheet (pdf-file), or the instruction manual, complies with EHSR 1.7.4.3 for the purpose of this pre-market surveillance exercise, provided the noise information is credible and understandable. It is important to note two further aspects regarding the compliance with EHSR 1.7.4.3:

• If noise information was provided only in the instruction manual, which was directly available at the product page, and this manual contained noise information, then EHSR 1.7.4.3 is met. Thus, for the purpose of this pre-market surveillance exercise, an instruction manual that is directly on a product website is considered as a part of the sales literature. However, this way of compliance with EHSR 1.7.4.3 does not imply compliance with EHSR 1.7.4.2 u).

• If a manufacturer provided noise information on the website and in the instruction manual available elsewhere, the noise information in both was compared to check for the second part of EHSR 1.7.4.3: Is the noise information given in the sales literature the same as in the manual (terms, noise emission values and their uncertainty (K value), etc.). Thus, even if a manufacturer does provide noise information in both, the manual and the sales literature, EHSR 1.7.4.3 cannot be met in some cases due to contradictions between the manual and the website/technical data sheet.

3.6 Results and discussions

3.6.1 Observations

- The layout and structure of sales literature varies a lot from one manufacturer to the other.
- Sales literature has a commercial purpose. Therefore, it is naturally focused on commercial aspects not on technical aspects and even less on aspects that are perceived as negative e.g. noise.
- Manufacturer websites very often provide a link (an email address, a telephone number) where the manufacturer can be contacted for further information. This is not considered as fulfilling EHSR 1.7.4.3 because the information is not readily made available to the potential users. The latter would have to ask for it. The few times a manufacturer was asked for information on noise, no reply was given in many cases.

NOMAD TF identified the following categories of sales literature regarding noise:

- The sales literature provides no information at all on noise (neither on the manufacturer webpage nor in documents the webpage gives direct access to),
- The sales literature provides information on noise explicitly on the manufacturer webpage with no need to use links in order to get more information on noise,
- The sales literature refers via a link to a technical data sheet where information on noise can eventually be found,
- The sales literature gives a link to the instruction manual (it is only in this case that it can be decided whether the second sub-EHSR of 1.7.4.3 is fulfilled).

The faults found in sales literature are very similar to those that the NOMAD survey revealed: absence of any information on noise, confusion between noise emission and noise exposure, confusion between sound pressure and sound power, wrong notations and terminology, absence of one of the two noise emission quantities required by the MD (EHSR 1.7.4.2 u). As one could expect, it was found that safety aspects are dealt with in the sales literature only if they concern high risks with serious consequences on the integrity or the health of the user. Because it has no immediate effects on workers, noise is only perceived as a major occupational risk if it is well known for being extremely high.

One large international machine manufacturing company gives extensive information about noise in its sales literature but the word "noise" is never used. The word "sound" is used instead. This shortcuts the negative aspect of the word "noise".

At a machine exhibition sales people were asked about noise. They could not give any valuable information. This raises the issue of the training of sales personnel regarding noise and the noise requirements of both the MD and the OND.

3.6.2 Analysis of the whole sample (not statistically significant)

Please note the results present here are not statistically significant because of the very small number of samples and due to the fact that the selection of each individual sample was not made in a way to make the whole sample reflect the whole European market for machines.

This starts with the sample collection in only five members states, continues with a possible preference for well-known brands, the accessibility of information for different families of machines, etc.

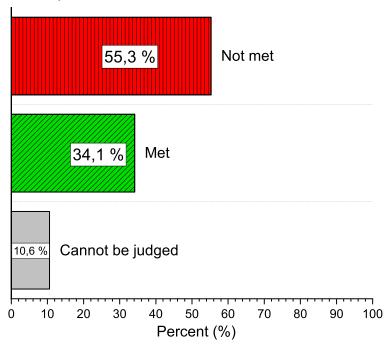


Fig. 1 Compliance of all samples (n = 85) with EHSR 1.7.4.3 (noise information in the sales literature)

In total, 85 samples of sales literature were analysed. Figure 1 shows the results for all machines regarding EHSR 1.7.4.3. This result hints at problems with the compliance with EHSR 1.7.4.3.

Figure 2 illustrates the compliance with EHSR 1.7.4.2 u) for all machines. This result seems like a slight improvement compared to the original NOMAD survey, which however had a much larger sample size n > 1500. The overall compliance in the original NOMAD survey was about 20 %. The large number of samples that could not be judged was caused by the fact that instruction manuals were not available on the manufacturer website in many cases.

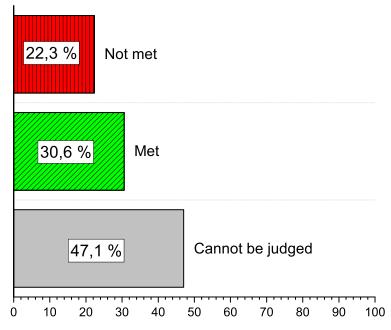


Fig. 2 Compliance of all samples (n = 85) with EHSR 1.7.4.2 u) (noise information in the instruction manual)

Figure 3 shows the compliance of woodworking machines with EHSR 1.7.4.3. This subgroup (n = 35) of the total sample shows a slightly better compliance than the total sample. This might be due to the fact that more machines targeting the end-consumer are among this subgroup.

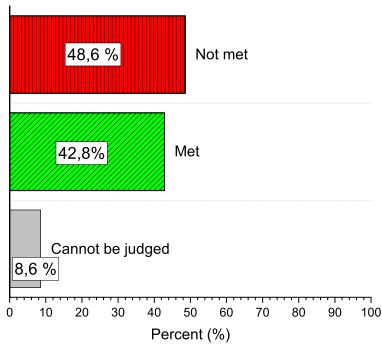


Fig. 3 Compliance of wood working machines (n = 35) with EHSR 1.7.4.3 (noise information in the sales literature)

Figure 4 shows the results regarding EHSR 1.7.4.2 u) for woodworking machines. Here, the same tendency as for EHSR 1.7.4.3 can be observed.

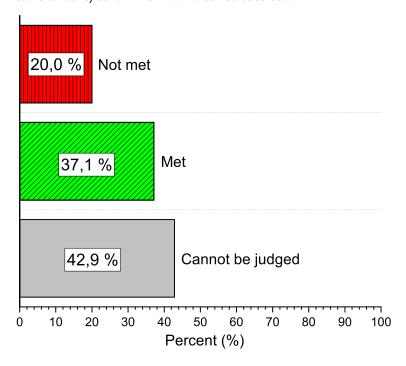


Fig. 4 Compliance f wood working machines (n = 35) with EHSR 1.7.4.2 u) (noise information in the instruction manual)

Figure 5 shows the compliance of outdoor equipment (n = 25), i.e. machines that are "additionally" in the scope of the "Outdoor" Noise Directive (OND) 2000/14/EC [8], regarding EHSR 1.7.4.3. As expected noise information is more readily provided due to the requirement of the OND to label the machines with the guaranteed sound power level. Nevertheless, quite a few manufacturers did not provide noise information in the sales literature. Note that most of these machines were portable chainsaws (Art. 13 OND) that are Annex IV machines according to the MD.

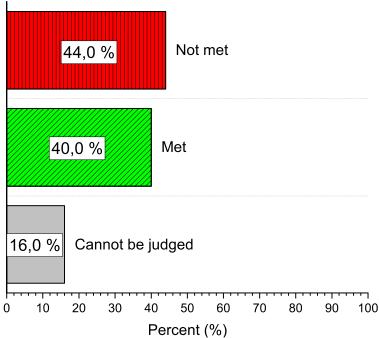


Fig. 5 Compliance of machines in the scope of the OND (n = 25) with EHSR 1.7.4.3 (Noise information in the sales literature)

Figure 6 shows the compliance of outdoor equipment with EHSR 1.7.4.2 u). Here, the noise information in the instruction manuals was compliant in the majority of the investigated instruction manuals.

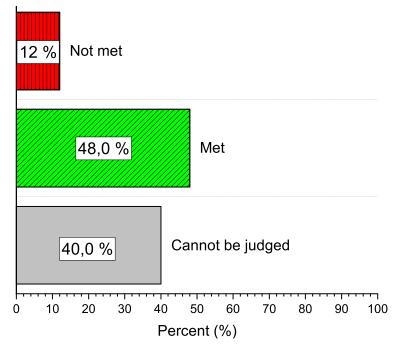


Fig. 6 Compliance of machines in the scope of the OND (n = 25) with EHSR 1.7.4.2 u) (Noise information in the instruction manual)

Figure 7 shows the results for the small subgroup of handheld machines. Only 17 samples were investigated and it is important to note that most of them were chainsaws (12 in total). Thus, the investigated chainsaws had a relatively good compliance with EHSR 1.7.4.3. Among the investigated samples were many well-known premium brands, so this might be the sole reason for the good compliance.

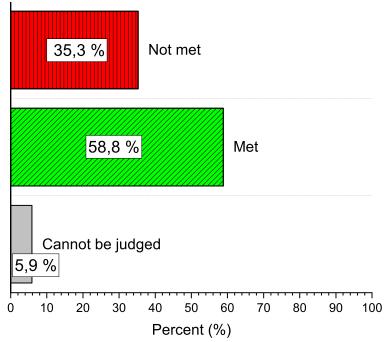


Fig. 7 Compliance of handheld machines (n = 17) with EHSR 1.7.4.3 (Noise information in the sales literature)

Figure 8 shows the compliance of the handheld machines regarding EHSR 1.7.4.2 u). Similar to the results for the sales literature, the noise information in the instruction manuals of the handheld machines is much better (70,6 % vs. 30,6 %) than for the whole sample. Here, it is important to note that the share of machines that could not be judged is much smaller than for the whole sample (5,9 % vs. 47,1 %).

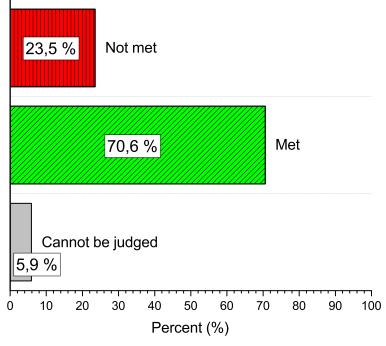


Fig. 8 Compliance of handheld machines (n = 17) with EHSR 1.7.4.2 u) (Noise information in the instruction manual)

3.6.3 Analysis of the subgroup of samples that could be judged

Please note that the results presented here are not statistically significant because of the very small number of samples and due to the fact that selection of each individual sample was not made in a way to make the whole sample reflect the whole European market for machines. This starts with the sample collection in only five members states, continues with a possible preference for well-known brands, the accessibility of information for different families of machines, etc.

Figure 9 shows the compliance of the samples (n = 76) that could be judged against EHSR 1.7.4.3. Since not that many samples had to be excluded, the results are very similar to those shown in Figure 1.

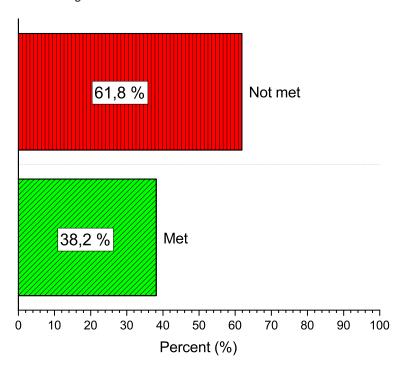


Fig. 9 Compliance of the machines whose sales literature could be judged (n=76) with EHSR 1.7.4.3

Figure 10 shows the compliance of the samples (n = 45) that could be judged against EHSR 1.7.4.2 u). By excluding those samples were the manual was not available, the results can be compared to those of the original NOMAD survey [2]. However, one should keep in mind that this pre-market surveillance exercise does not yield results that are statistically significant. For further discussions, see Sec. 4.

The results for the subgroups (woodworking, etc.) can be found in Appendix A.2.

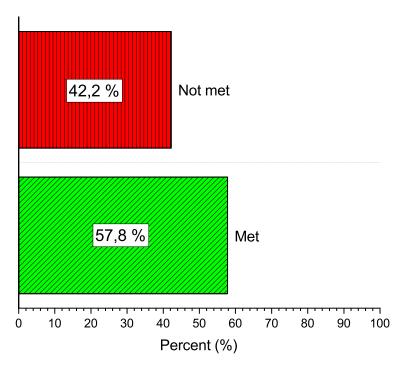


Fig. 10 Compliance of the machines whose instruction manuals could be judged (n = 45) with EHSR 1.7.4.2 u)

4 Conclusions

4.1 Noise information in sales literature

Noise information in the sales literature of machines (EHSR 1.7.4.3) is key to successfully implement the "Sell & Buy Quiet" concept [7], although it is not viewed as important for the safety of workers as that in the instruction manual. Furthermore, it is an essential health and safety requirement of the current MD 2006/42/EC as well as of the coming Machinery Regulation. That said, the observed compliance with EHSR 1.7.4.3 of 34,1 % (while 10,6 % could not be judged, see Sec. 2.6.2) is far from satisfactory even when considering that the results of the pre-market surveillance exercise are not statistically significant, but a mere glance at the situation. The Internet actually should enable most manufacturers to provide noise information to potential buyers. It would be sufficient to copy the relevant section of the instruction manual to the product website near the performance data or - if the interpretation of the NOMAD TF is correct - to provide a link to the instruction manual on the product website. However, providing the manual online is no obligation for manufacturers. Another possibility is to provide a technical data sheet which contains the same noise information as the instruction manual as a pdf on the product website.

Excluding those machines whose sales literature could not be judged regarding EHSR 1.7.4.3 yields very similar results (n=76): 61,8 % did not meet the requirements of EHSR 1.7.4.3, while about 40 % (38,2 %) complied with it. Compared to the original NOMAD survey [1], which however investigated instruction manuals and their compliance with 1.7.4.2 u), the compliance is much better about 40 % vs. about 20 %. Nonetheless, a compliance of 40 % is not satisfactory and indicates that more action should be taken to improve the situation.

4.2 Noise information in the instruction manual

Regarding the noise information in the instruction manual (EHSR 1.7.4.2 u)) the results are similar: 30,6% of the machines had instruction manuals that met EHSR 1.7.4.2 u). Since manuals were not available in many cases, the compliance with EHSR 1.7.4.2 u) could not be judged for 47,1% of the machines.

To compare the results regarding EHSR 1.7.4.2 u) to the original NOMAD survey, one has to

focus on the samples that could be judged, which are about half the machines (n =45) of the whole sample of 85 machines. As illustrated in Figure 10, almost 60 % (57,8 %) of the investigated instruction manuals in this small, not representative sample comply with EHSR 1.7.4.2 u). This result is in stark contrast to the result of the original NOMAD survey [2] where only about 20 % of the instruction manuals met the requirements of EHSR 1.7.4.2 u). Thus, despite the non-representative sample of the pre-market surveillance exercise regarding sales literature, one might conclude that the compliance with EHSR 1.7.4.2 u) has improved

5 Recommendations

since 2012.

The experience with sales literature gained at doing the pre-market surveillance exercise and the results obtained trigger the following recommendations that ADCO Machinery should make to each stakeholder group.

5.1 To manufacturers

- Make instruction manuals available on product websites and in online advertisements.
 Doing so, you will automatically meet EHSR 1.7.4.3 and contribute to the necessary but still poor dialog on noise between manufacturers and potential users.
- For printed sales literature: Include the same noise information as in the instruction manual. Make sure to copy everything and provide the same numbers (including the uncertainty).
- Follow the requirements concerning the contents of the noise declaration given in the noise test code specific to the machines you manufacture.

5.2 To users

Before buying a machine ask the manufacturer for the instruction manual unless it is readily available on the manufacturer website. Use the NOMAD Guide for buyers of machinery [3] to make sure you buy a quiet machine.

5.3 To national authorities and Occupational Safety and Health advisors

- In your market surveillance actions, recommend manufacturers to provide the instruction manual to potential buyers so that they easily meet EHSR 1.7.4.3.
- When training stakeholders in the field of noise reduction at the workplace, do not forget the role that sales literature plays as a strategic tool to successfully implement the Sell & Buy Quiet concept [7].

5.4 To the European Commission

- In your actions to enforce an effective field implementation of EHSR 1.7.4.3 of the MD, put pressure on stakeholders concerned so that in their own actions they use EHSR 1.7.4.3 as a strategic tool.
- Instruct HAS consultants to encourage drafters of standards to cover EHSR 1.7.4.3 in C-standards harmonized under the MD.

5.5 To drafters of C-standards harmonized under the MD

Draft very carefully the clause regarding the noise emission declaration of noise test codes for machinery families as it will be used by manufacturers to prepare their manuals and their sales literature. Insert in the noise test code examples of good quality noise emission declarations.

Appendix A

A.1 The assessment grid

Figure 11 shows the first part of the assessment grid that had to be filled by the Member state collecting the sample.

3			Please remember	to include this file in	the sample file!			
4			Ticase remember	to include this file in	the sumple me.			
	1. General data							
5	1. Concrar data							
	Your country (Select from dropdown- menu)	Date of retrieval (Day.Month.year)	Provider of the information (Manufacturer, authorized representative or distributor) OPTIONAL!	Name (of manufacturer, authorized representative or distributor)	Country of manufacturer or authorized representative	Address	URL	
	Germany	31.08.2022	Distributor		Germany		Examplelink	
	File name Introduce "_" between the parts of the sample code (example: "DE_3108_CHAINSAWBRAND_SAW_2000") 1. Country code of NOMAD member (e.g. SE, NL, DE, FR, ES)							
0		DE_3108_CHAINSAWBRAND_SAW_2000		2. day-month (XXYY) 3. Full brand name (e.g. CHAINSAWBRAND) 4. Full model name or type number (e.g. SAW 2000)				
2								
-	2 What kind of sale	es literature did v	ou get? And how did you get it?					
	Z. Wilat Killa Ol Sali	es interacture did y	od get: And now did you get it:					
	Did you get the information online?	If you did not get the information online, please name the source below:	What kind of information did you get? Please select below:	If you got the info only upon request, what did you get?	Did you get the instruction manual?	Was there a contact form or contact information that could be used to get more information, e.g. the instruction manual?		
5	Yes		The instruction manual itself (in addition to the info on the website)		Yes	No		
7								
3	Did you contact the manufacturer?	Is noise information provided? (Yes or no? Dropdown-menu)	If noise information was provided, where was it provided? Please select: 1. (Only) in the instruction manual 2. The website/catalogue/technical data sheet 3. In Both: The instruction manual & website/catalogue/technical data sheet	Can the noise information on the website/in the catalogue/in the technical data sheet be compared to that in the manual?	If it cannot be compared, why can't it be compared? 1. The instruction manual was not available online d 2. The manufacturer/distributor did not offer to send the m			
,	Yes	Yes	3. In Both: The instruction manual & website/catalogue/technical data sheet	Yes				

Fig. 11 First part of the Excel-file that served as the assessment grid.

Figure 12 shows the second part of the assessment grid. Note that items from item 4. onward were filled by the French and German members of the NOMAD TF.

	own words how you got the manufacturer or dist	c.) and provide dates, in case you	Any other comments?			
nau to request it from	the manufacturer or dist	indutor.				
		t site there was also a link to download the	manual. Thus, the manual			
should be considered	ed as part of the sale:					
3						
2 Marking	C					
3. Machine speci	ric data					
Brand	Modell	Type of machine	Is performance data provided?	Performance data (if		
brand	Wiodell	Type of machine	(Yes or no? Dropdown-menu)	provided)		
3			, ,			
CHAINSAWBRAND	SAW 2000	Chainsaw		Sword length: xx cm		
			Yes	Power: xx kW		
4. To be evaluate	d later (by French a	and German TF members as well as volu	nteers)			
3						
+						
Additionally in the sco	ne Machine family	Annex IV (Yes or No?)	Are numerical values given?	Are operating conditions		
of the OND				given?		
5						
Yes	Chainsaw	Yes	Yes	Yes		
5						
,						
	a Are the uncertainties	Are the declared values credible?	Are the standards used the right	Is the noise information in	If the answer is "no", what are th	
noise test code?	provided or inlouded	The tire decidred raides of edister	ones?	the sales literature	differences?	
Holde test code.	provided of illicaded					
noise test code.	in the values?			identical to that in the		
noise test code.	· ·			identical to that in the manual?		
3	in the values?			manual?		
Yes	· ·	Yes	Yes			
3	in the values?	Yes	Yes	manual?		
Yes	in the values?	Yes	Yes	manual?		
Yes	in the values?	Yes	Yes	manual?		
Yes Score (based on the	in the values?	Yes	Yes	manual?		
Yes Score (based on the questions above)	in the values?	Yes	Yes	manual?		
Yes Score (based on the questions above)	in the values? Yes 7		Yes	manual?		
Yes Score (based on the questions above)	in the values? Yes 7	Yes NSAWBRAND_SAW_2000	Yes	manual?		

Fig. 12 Second part of the Excel-file that served as the assessment grid. Note that items from item 4. onward were filled by the French and German members of the NOMAD TF.

Figure 13 shows the conclusion step in the assessment grid. This part was filled by the French and German members of the NOMAD TF.

Country code of NOMAD member (e.g. SE, NL, D	E, FR, ES) 2. day-month (XXYY) 3. Full brand name (e.g. Ci	HAINSAWMANUFACTURER) 4. Full mo	del name or type number (e.g	SAW2000)		
. Conclusion-step						
ilobal assessment of the quality of t	he noise information in this sample of	Assessment against EHSR 1	Assessment against EHSR 1.7.4.3			
sales literature? (Dropdown-menu, selection similar to original NOMAD 1						
grid)						
Complying with the directive:	Covered					
Comments						
The information on the product page doescontain all the noise emission data from the manual. In addition to that the manual is readily						
available here.						
	Conclusion-step Slobal assessment of the quality of tales literature? (Dropdown-menu, strid) Complying with the directive: Comments The information on the product page doescontain	Conclusion-step Slobal assessment of the quality of the noise information in this sample of ales literature? (Dropdown-menu, selection similar to original NOMAD 1 rid) Complying with the directive: right and very clear for end-user Comments The information on the product page doescontain all the noise emission data from the manual. In additional contents are information on the product page doescontain all the noise emission data from the manual.	Conclusion-step Slobal assessment of the quality of the noise information in this sample of ales literature? (Dropdown-menu, selection similar to original NOMAD 1 rid) Complying with the directive: right and very clear for end-user Comments The information on the product page doescontain all the noise emission data from the manual. In addition to that the manual is readily	Complying with the directive: right and very clear for end-user Comments The information on the product page doescontain all the noise emission data from the manual. In addition to that the manual is readily		

Fig. 13 Conclusion step of the assessment grid

A.2 Diagrams for the subgroups of samples that could be judged (Woodworking machines, OND machines, handheld machines)

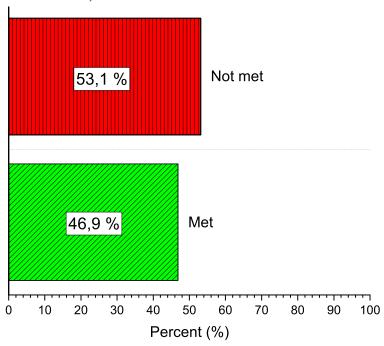


Fig. 14 Compliance of the woodworking machines whose sales literature could be judged (n=32) regarding EHSR 1.7.4.3

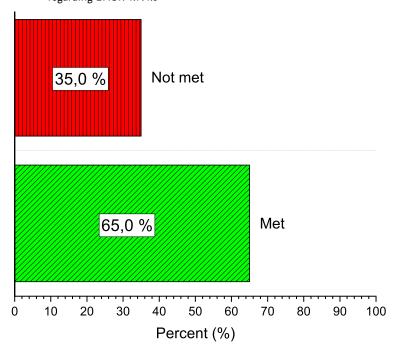


Fig. 15 Compliance of the woodworking machines whose instruction manuals could be judged (n=20) regarding EHSR 1.7.4.2 u)

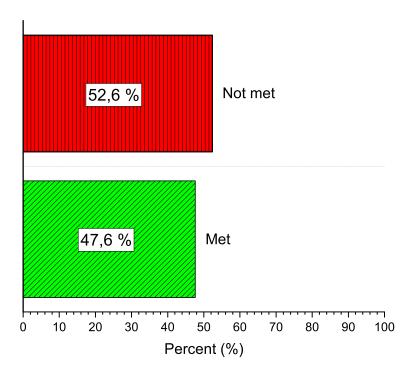


Fig. 16 Compliance of the OND machines whose sales literature could be judged (n=21) regarding EHSR 1.7.4.3

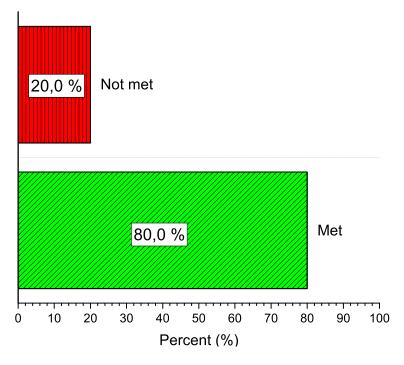


Fig. 17 Compliance of the OND machines whose instruction manuals could be judged (n=15) regarding EHSR $1.7.4.2 \, u$)

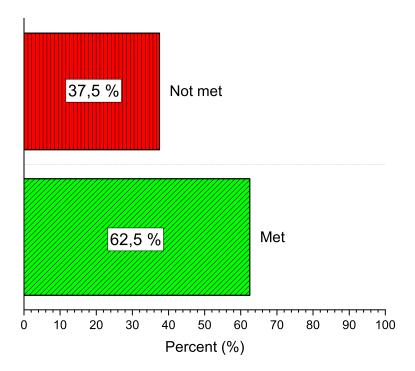


Fig. 18 Compliance of the handheld machines whose sales literature could be judged (n=16) regarding EHSR 1.7.4.3

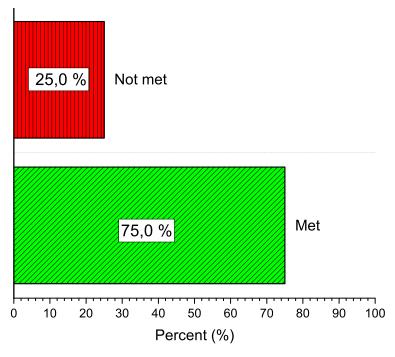


Fig. 19 Compliance of the handheld machines whose instruction manuals could be judged (n=16) regarding EHSR 1.7.4.2 u)

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Gender-neutral language is used in this publication. Where this is not possible or would detract from the readability of the text, terms used to refer to persons include all genders.

