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Confédération Européenne des Entrepreneurs de Travaux Techniques Agricoles, Ruraux et Forestiers

European Organisation of Agricultural and Rural Contractors

Europäischer Zentralverband der Lohnunternehmer

(Commission\Entr\Consultation narrow tractors-EN)

**TRL**

Crowthorne House, Nine Mile Ride,  
Wokingham  
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Brussels, 17 September 2014

**Re: "Assessment of the availability of technology allowing vehicles of category's T2, T4.1 and C2 to fulfil Stage IV emission limits"**

Dear Sir,

We are pleased to submit you herewith our contribution to the study commissioned by DG enterprise on the abovementioned issue.

CEETTAR, member of the WGAT, is the organisation representing agricultural and rural contractors at European level. Therefore, the aim of our organisation on this topic is provide you with our analysis of the impact of additional equipment on narrow tractors in a user's point of view.

First of all, we would like to emphasize that agricultural and rural contractors are supporting the improvement of the technology of the agricultural machinery in order to reduce the environmental impact of their activities. Reducing GHG emissions is one of a driver of investment motivated by many reasons, including CSR and marketing ones.

During the last months, our organisation started an internal exchange of views with the member organisations which are the most concerned by the use of tractors and vehicles from the T2, T4.1 and C2 categories. Hereunder, you will find our conclusions.

As you will see, considering the technology currently available, our members identified a number negative impact with the implementation of the pollutant emissions stage IIIB and IV. According to contractors, the most important issue is that the current possibilities offered by manufacturers require the addition of a specific element.

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This equipment, be it located on top of the bonnet, on the side or even below, is limiting the performance of the machines for the driver. Indeed it can, depending the position of the equipment:

- reduce the visibility ahead: this a problem to perform correctly an agricultural work as well as dangerous for the operator and other users when on roads (e.g. going from a field to another...);
- require an increased steering radius or widened tractors. The recent downsizing of tractors was justified by tighter row spacing. Therefore, an increased steering radius or larger tractors are not an option for the contractors;
- make impossible the use side implements. Tractors are versatile machines to which other features, like articulating bodies can be added. This functionality is crucial for contractors who are doing very different works with the same machines in order to reduce the cost of their services;
- reduce their capacities on steep hills. As tractors are getting smaller, they also tend to get less powerful. Additional constraints on the engine power could be even dangerous in some situations; hills are quite common in vineyards.
- limit the fuel autonomy. This seems less relevant but still is an important element for the contractors when they invest in a new equipment. They have to provide services to clients who are not always located in the same area in a very short period of time;
- raise the costs of the machines. Unfortunately, prices aren't coming down, even though the tractors are getting smaller. Part of the reason is these types of tractors are specialized machines. An additional equipment would simply further increase the price of the tractors, at a period when all the enterprises are trying to cut costs.

We hope that these comments will bring you useful information for the finalisation of the study. We remain of course available for any supplementary information, should you believe it necessary.

Yours faithfully,



Eric DRESIN  
Director