

In connection with the trialogue process underway, we wish to present our view relating to the transposition date of the new electromagnetic fields (EMF) Directive.

In order for businesses and notably SMEs, to adequately protect the health and safety of workers against electromagnetic fields, it will be necessary for them to have the practical guide (see Article 13) available to them, when they are preparing to implement the Directive.

We note in the first paragraph of Article 13 "The Commission shall draw up practical guides **before** [the date of transposition] in order to facilitate the implementation of this Directive".

We consider that any decision on the transposition date should allow a period of a minimum of 18 months between the publication of the practical guide and transposition to provide sufficient time for employers to put in place all the provisions of the Directive.

Therefore, if the practical guide takes, for example 2 years, to prepare from the time the Directive comes into force this implies that a transposition period of no less than **3 and a half years will be needed.** Preferably **4 or 5 years** should be given so as to allow effective implementation of the Directive by employers.

<u>CEEMET</u> - Council of European Employers of the Metal, Engineering and Technology-Based Industries, <u>ACEA</u> - European Automobile Manufacturers Association, <u>BNE</u> - Broadcast Networks Europe, <u>CLEPA</u> - European Association of Automotive Suppliers, <u>EURELECTRIC</u> - Union of the Electricity Industry, <u>Euro Chlor</u> - Representing the European Chlor-Alkali Industry, <u>EWA</u> - European Welding Association, <u>ORGALIME</u> - European Engineering Industries Association, <u>UEAPME</u> - European Employers' Organisation for Crafts, Trades and SMEs,