

KEEP STATIC TEST (UP to X kph?)

1. Past and present European approach. Static test has always been present in the EU approval and considered equivalent to the dynamic one. See directive 2009/144/EC (Annex IV), as amended by 2013/8/EU, and all previous directives starting from 89/173/EEC.
2. Future European approach (Mother Regulation). Present requirements will be transferred into Delegated Acts. Thus static test will stay in the EU approval, at least up to 40 kph. Starting from 2016 and for many years it will be possible to test mechanical couplings according to the static method. TFAC, before introducing a different approach, should provide detailed justifications and reasoning.
3. Industry approach (CEMA). Consensus among EU Ag machinery Manufacturers. Agreement is to keep static test up to 40 kph and make dynamic test mandatory only for fast tractors.
4. National approach. In Italy national CUNA couplings, now part of the European directive (2013/8/EU), has always been tested according to the static procedure (starting from 1976). Dynamic test is NOT present into Italian national standard (CUNA NC 338-02 and 438-06). Thus a CUNA coupling has never been approved with a dynamic test. This is not only an Italian concern, because static test method is currently performed on other EU coupling devices (e.g. tractor drawbars, ISO 6489-3).
5. Side-effect on couplings design. Mandatory dynamic test on all couplings will introduce changes in the design and manufacturing of certain coupling types. By consequence carefulness has to be adopted, in order to avoid un-justified burdens towards coupling Manufacturers.
6. No safety concern. There is NO evidence that coupling devices (e.g. CUNA) approved according to the static procedure are less safe than those approved via dynamic test. In Italy there is a lot of expertise on static tests; all agricultural couplings on the market have been approved by this test and no accidents or concerns related to the strength of the coupling have been reported. Before deleting or ignoring such a back-ground, experimental evidence of safety concerns has to be provided.
7. Approval timing and cost. Dynamic test is much more longer and expensive than a static one. Thus a new burden for Manufacturers would be introduced.