

FEM Racking and Shelving Product Group



Purwell Cottage, Purwell Lane
Hitchin Herts, SG4 0NF

Secretary General: Colin Hinton
Business & Finance: Gill Hinton

Email: colin.hinton@fem-rands.org or gill.hinton@fem-rands.org

Website: www.fem-rands.org

13th October 2023

For the attention of:

Mr Massimo Sessa	Consiglio Superiore dei Lavori Pubblici Servizio Tecnico Centrale
Mr Mariarcangela Ramundo	Consiglio Superiore dei Lavori Pubblici Servizio Tecnico Centrale
Mr Olivier Janin:	Secretary General: FEM Brussels
Mr Giuseppe Fabbri:	Chairman of CEN TC 344
Mr Giuseppe Fabbri:	Technical Advisor AISEM

Cc:

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

Dear Sirs,

The racking industry, through FEM Racking and Shelving and CEN TC344 have worked tirelessly to produce guidance documents and EN Standards to promote a single market and a level playing field throughout Europe. The European single market is one of the EU's greatest achievements.

One of these Standards is EN 16681:2016 Steel Static Storage Systems – Adjustable pallet racking systems – Principles for Seismic Design, which is based on the expertise of a wide range of experts and research institutes, as well as EU research projects. This Standard represents the state of the art and is considered to be the highest reference document for designers/structural engineers for the seismic design of Adjustable Pallet Racking in Europe.

FEM Racking and Shelving are, therefore, extremely disappointed when Public Authorities from a single Country produce and issue a document which introduces Local Requirements and design factors that are not in accordance with the requirements of EN 16681:2016.

The 'LINEE GUIDA PER LA PROGETTAZIONE, ESECUZIONE, VERIFICA E.MESSA IN SICUREZZA DELLE SCAFFALATURE METALLICHE' document, produced by 'Consiglio Superiore dei Lavori Pubblici Servizio Tecnico Centrale', is a guidance document and is, therefore, non-mandatory. However, this document has led to disruption especially in the Italian racking market. This document also creates confusion for European racking companies in this area of work and can negatively influence the exchange of products in the European Single Market.

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FEM R&S request that the above document is withdrawn from publication and is submitted, with the associated background documents to justify the changes from EN 16681:2016, to CEN TC344, in order that the information can be considered by all EU Members and, if required, EN 16681:2016 can be reviewed and amended appropriately. Your assistance in this matter would be appreciated.

The recommendation of FEM R&S is that the seismic design of racking structures provided within the CEN member countries should be designed in accordance with EN 16681:2016 without alteration.

Regards,

For and on behalf of the FEM R&S

A handwritten signature in blue ink that reads 'E. Talmann'.

Eugen Talmann

President

FEM Racking and Shelving

A handwritten signature in black ink that reads 'Colin Hinton'.

Colin Hinton

Secretary General

FEM Racking and Shelving