ETUI’s views on the (possible) revision of the Machinery Directive

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The (revision of ) Machinery Directive and :

a. ... and the shopping list compiled by some experts and groups: manufacturers must be able to build a machine without standards, on the basis of the highest level of technology (State of the Art) accessible when the machine is designed within the industry sector to which they belong.

b. ... the perception that the directive is flawed: this is often due to confusion between the role of the law (the Directive), the standards and the state of the art. The absence of standards B or C or vague knowledge of the state of the art does not mean that the Directive is deficient. A good definition of State of the Art in the articles should help.

c. ... developments in digitalisation, such as IoT, AI and the new generation of autonomous robots: further analysis is welcome, but uninformed conclusions can be counterproductive;
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d. ... A.I.: it is vital to prioritise the natural intelligence of the designer (because there is one) and encourage diligence among value chain stakeholders to exchange information in order to manage risks (the designer of A.I., the constructor integrating the A.I., the employers purchasing equipment and the end user).

e. ... A.I.: efforts must be made to systematically eliminate anthropomorphisms from the vocabulary of A.I. (it 'decides', 'thinks', 'feels', 'acts') that feed into the fiction of an 'autonomous entity' who frees the value chain from responsibility -

f. We are against the idea that robots (any robots) can be put on the market as objects without a specific purpose.
g. ... standardization: full support to exploratory initiatives. But only standards covering stable and consolidated technologies can aim to satisfy the directive’s requirements, key is to get a wider input from all stakeholders in to the process.

h. ... Single Market responsibilities: these are to some extent fragmented and separated in the Commission and various fora. More interplay between the MD and the Use of Work Equipment Directives and the work of the MD ADCO and MACHEX groups is needed. More proactive work is needed particularly aimed at ergonomic issues, the cause of much ill-health – such as Commission partly funded joint actions.

i. ... EU-wide accident database. Twenty years of useless discussions on how to merge existing national databases must come to an end. Only a bold decision to build on and combine the best of ICSMS and RAPEX should be prioritized.
The Machinery Directive and the management of interfaces

- Risk Assessment
- Harmonised Standards
- Standardizers
- Internal Guidance
- Technical File
- Instructions
- EC Declaration of Conformity
- Manufacturers
- Employers
- Users
- Consumers

2006/42/CE
2009/104/CE