



Machinery Directive 2006/42/EC

Orgalime Proposal for the European Commission Guidelines

Art. 1 and 2h: Are prototypes and pre-series in the scope of the machinery directive?

What is unclear in the directive 2006/42/EC and has to be clarified?

Sometimes (e.g. for big printing machines, intended to be used in newspaper production) there is a need to install prototypes (in a newspaper printing house that is usually a potential customer) in order to test out the machine under conditions of reality (such as use of various paper quality, temperature or humidity in the facilities etc.). The same applies for mobile machinery which has to be tested under real conditions.

For such tests, personnel of the manufacturer has to dismantle protection equipment (such as hoods, doors etc.) just in order to be able to see “what the machine is doing” under various conditions. The same goes for “fine tuning” in order to find out the optimal function of the machine.

Neither the previous directive 98/37/EC nor the new directive expressly deals with prototypes.

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Prototypes and pre-series are, per definition, still in the development process and are therefore not yet “placed on the market” as defined in Article 2. h) of the new Machinery Directive.

Thus, prototypes and pre-series are not covered by the Machinery Directive and have, therefore, not (yet) to meet the essential requirements of the directive.

When prototypes and pre-series are tested as part of the development process and conformity assessment of the machine, it can be done either in the manufacturer’s or the (potential) customer’s premises. During such tests under “1:1 conditions” reflecting the latter real use in the daily business, all necessary and adequate measures have to be taken to ensure the protection of persons. Furthermore, the personnel involved in such test has to be trained and supervised adequately.

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