

## Orgalime Proposal for the European Commission Guidelines

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### e.g. Article 1.2 (k)

“ (k) electrical and electronic products falling within the following areas, insofar as they are covered by Council Directive 73/23/EEC of 19 February 1973 on the harmonisation of the laws of Member States relating to electrical equipment designed for use within certain voltage limits (3):  
— electric motors;”

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

Technically speaking an electrical motor and an electrical generator are the same electrical product. Unfortunately, only the motor is mentioned.

It might be unclear whether the electric generator is also covered by this exception. Therefore, the situation has to be clarified.

### **Orgalime Proposal for the European Commission Guidelines:**

#### → Electrical motors and generators:

The subject is here the bare electrical motor without any application and the bare electrical generator without a mechanical driving system. It is a given fact that an electrical motor and an electrical generator are the same electrical product.

Considering this product:

- √ If the power input is electrical (and the output is mechanical), the product is an electromotor, (see picture A). The product is then a converter of electrical energy into mechanical energy. If the electromotor is combined with an application such as a sawing or grinding device, the entire combination is called a sawing or grinding machine. The machine is in this context the entire combination constituted by the electrical motor and the mechanical application.
- √ If the power input is mechanical (and the output is electrical), the product is a generator (see picture B). The product is then a converter of mechanical energy into electrical energy. If the generator is combined with a mechanical drive system producing the force to drive the electrical generator, the combination is a machine. Some people call it a generator set. The machine is in this context the entire combination constituted by the drive system providing mechanical input for the generator and the electrical generator itself. An example of the mechanical input is a combustion motor (petrol or diesel).

**Disclaimer: The content of this fiche represents European industries' position on the subject. This position has been coordinated and agreed by European industrial associations collaborating on Orgalime's platform. This is therefore not an official European Commission guidance document.**

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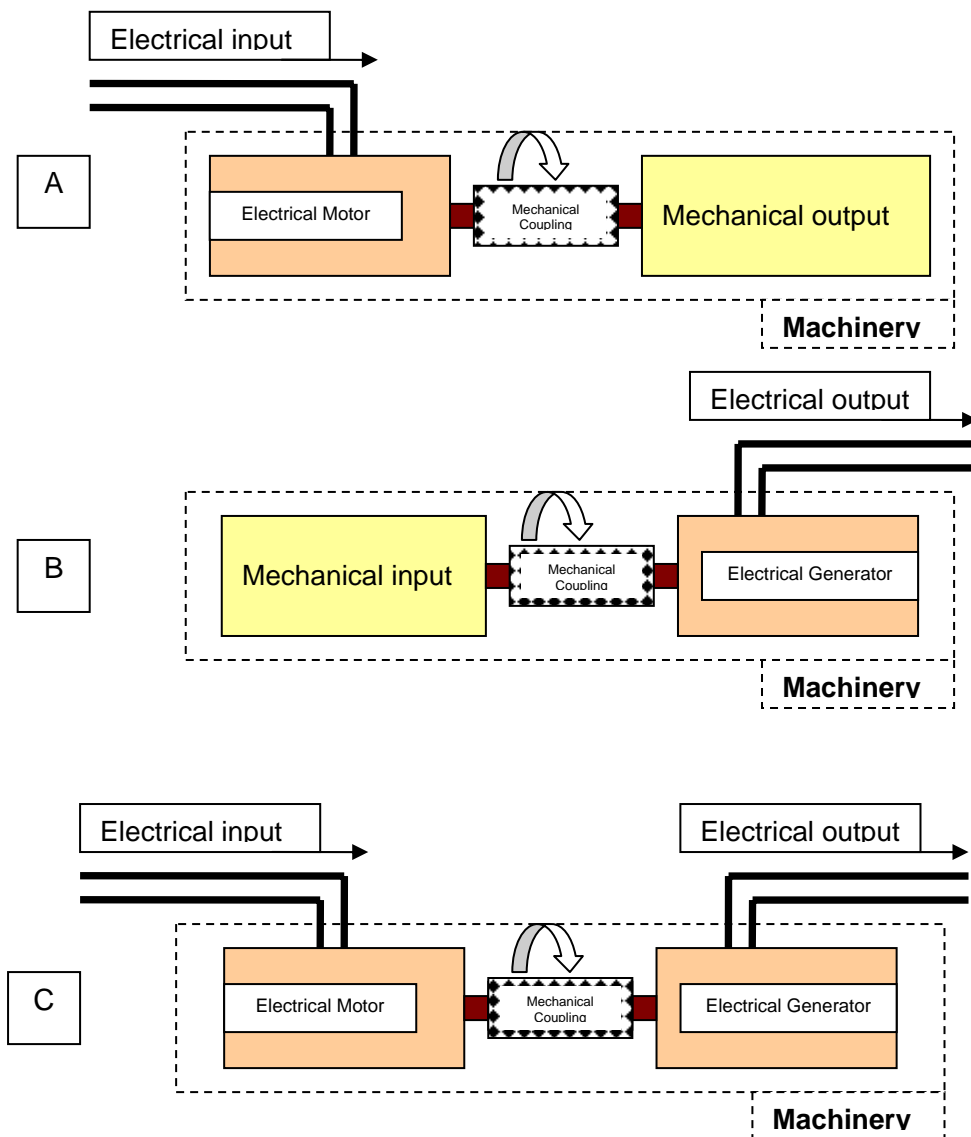
*Orgalime, the European Engineering Industries Association, speaks for 35 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 23 European countries. The industry employs some 10.9 million people in the EU and in 2007 accounted for some €1,813 billion of annual output. The industry not only represents more than one quarter of the output of manufactured products but also a third of the manufactured exports of the European Union.*

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In these pictures a DC generator or a DC motor can be the same product, and also an AC generator or an AC motor can be the same product. Only the direction of the power conversion is different.

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→ Which Directive is covering which product?

If the electromotor is manufactured for a voltage within the voltage limits of the Low Voltage Directive (LVD), it is covered by the Low Voltage Directive. The entire combination of electromotor and application is covered by the Machinery Directive.

If the generator is manufactured for a voltage within the voltage limits of the Low Voltage Directive, it is covered by the Low Voltage Directive (LVD). The entire combination of the generator and drive system is covered by the Machinery Directive.

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