



# Machinery Directive 2006/42/EC

## Orgalime Proposal for the European Commission Guidelines

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Article 2 (a), first indent, and Art. 2 (g)

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

Delimitation of Partly Completed Machinery (PCM) and fully completed machines without a drive system.

What is the difference between:

- A machine according to Article 2 a), first indent, intended to be fitted with a drive system, and
- A Partly Completed Machinery (PCM) according to Article 2 g) without a drive system, intended to be incorporated into or assembled with other Partly Completed Machinery (PCM) such as a drive system (please note that drive system is defined as Partly Completed Machinery (PCM) in the same article)?

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

A machine without a drive system can only be dealt with as a complete machine which can perform a specific application when the manufacturer of the machine has taken into account all the risks applicable to the machine including those connected to the (missing) drive system, and therefore defines exactly the type, power, connecting parts etc. of the drive system, which will be installed by another person. Thus, the missing but intended drive system also forms part of the manufacturer's conformity assessment. Furthermore, the manufacturer has to provide his/her customer with all necessary information regarding selection and installation of the drive system.

In this case, the CE marking of the machine also covers the assembly machine + drive system (added subsequently by another person). This condition is valid only if the user follows the instructions delivered by machine and Partly Completed Machinery (PCM) manufacturers.

If the drive system is not defined and assessed in the above sense, the machine without a drive system is a Partly Completed Machinery (PCM). Thus, the person who carries out the assembling of Partly Completed Machinery (PCM) (not complete machine) + drive system Partly Completed Machinery (PCM), becomes the manufacturer of the complete machine.

**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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