

### Article 2 g) Components

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

The definition of Partly Completed Machinery (PCM) introduced in directive 2006/42/EC may lead to extremist interpretations where all components would be considered as Partly Completed Machinery (PCM). This is not the aim of the Machinery Directive revision. According to manufacturers' experience with directive 98/37/EC (and in a similar way with 94/9/EC), the status of valves has to be clearly stated.

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

Equipments falling under Partly Completed Machinery (PCM) definition should only be those which were subject to incorporation declaration under 98/37/EC already. Partly Completed Machinery (PCM) should not extend to components.

Manual valves, valves without actuating device (as components) and check valves are excluded from the scope.

Actuated valves and valve actuators may be considered as Partly Completed Machinery (PCM) only when specified to be incorporated into a machine and have to follow the procedure referred to in Article 13 of Directive 2006/42/EC (including the declaration of incorporation described in Annex II 1.B). Otherwise, they are considered as components.

#### Note:

The safety of valves is already ensured by the following directives:

- 97/23/EC (PED) regarding pressure hazards;
- 94/9/EC (ATEX) regarding explosion hazards;
- 2006/95/EC (LV) and 2004/108/EC (or 89/336/EC until July 20<sup>th</sup>, 2009, EMC) regarding electrical hazards;
- 89/106/EC (CPD) when applicable.

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