



IMCO Committee Amendments to the Revision of the Machinery Directive

February 2022

Dear Member of the European Parliament's IMCO Committee,

First of all, we would like to thank you for your work on the proposal for a revision of the Machinery Directive that is currently under consideration in the IMCO Committee. With view to the upcoming discussion in the IMCO Committee on 28th February, we would like to call your attention on the following points, which are of particular interest to Small Business Standards and its members.

With regards to the proposal to empower the Commission to **establish technical specifications (Art 17.3)**, SBS supports Ams. 119 and 242. Such an empowerment by the Commission should be taken exclusively as a last resort and in any case providing an inclusive role of stakeholders, including SMEs, in the adoption of technical specifications.

Regarding the issue of **substantial modification (Art. 3.16; Art. 15)**, SBS strongly supports Ams. 6, 19, 175 and 178 which provide more clarity and balance to the definition of "substantial modification".

Regarding the **exclusion for Light Electric Vehicles** - Article 2.2(e), SBS regrets to see the direction taken by the debate in IMCO, which calls for a roll-back of the original exclusion present in the Commission proposal. In this sense, SBS strongly opposes Am. 2 and any further amendment (Ams. 105 and others) which cancels the proposed exclusion.

On Annex I, **"high-risk" machinery**, SBS strongly oppose all amendments (351, 355 and others) that either severely weaken or delete altogether from the text the provisions of Annex III point 1.1.9 – "Protection against corruption".

On the issue of **conformity assessment procedures**, SBS reiterates its position that the manufacturer should be allowed to assess the conformity of machinery included in Annex I without being obliged to involve a third party if the machinery is manufactured in conformity with harmonised standards covering all the relevant EHSRs. Furthermore, SBS opposes Am. 265, which deletes the proportional reduction of third-party assessment fees for SMEs.

Contact

Andrea Raffaelli, Standardisation Policy Officer and Experts Coordinator
a.raffaelli@sbs-sme.eu; T +32 (0)2 285 07 23; Mobile: +32 (0)472 34 76 19