

# EGMF Position Paper

## Proposal to amend the Annex 1 – Section 1.7.4 'Instructions' of the Machinery Directive

Brussels, 11 February 2020

EGMF, the European Garden Manufacturing industry Federation, is representing major manufacturers of garden, landscaping, forestry and turf equipment. Through its 30 European corporate members and 7 National Associations, EGMF represents over 18 million units placed on the European market, accounting for around 80% of garden machinery, and EGMF members employ over 120,000 people in the EU.

### **1. Providing instructions to the purchaser of machinery**

As indicated in the Machinery Directive guideline, the text of the directive does not prescribe a specific form in which to deliver the instructions. However, due to interpretations that instructions are written, it has always been assumed that a paper format must be supplied.

Because of the current state of the art, as well as the environmental benefits (see EGMF position paper 'EGMF-1' shared with the EC Editorial Group in November 2017), it is proposed that as well as paper documents, electronic documents are also allowed, which would be in conformity with the legal requirements.

These electronic documents should be provided in a format which is readable by freely available software, compatible with all electronic commonly available devices on the market, and must be made available on the manufacturer's website. The manufacturer should inform the purchaser of their products, the exact location of the documents and indicate that shortly after the time of purchase, a copy is downloaded and stored at a private location which is accessible offline. In case the purchaser requests a paper copy of the documents, this should be provided free of charge at the time of delivery of the machinery.

Manufacturers, specifically for consumer products, may combine the electronic documents with a simplified version of the instructions in printed format, which should include a minimum of specified information for the user to be able to operate the machinery.

The below proposal would allow the manufacturer to deliver instructions in a manner which suits the purchaser. It would also allow the use of electronic documents, and where appropriate, in combination with simplified instructions. This proposed approach will increase the means of accessing the machinery instructions for the purchaser also during operation of the machine on a distant location from possible paper copy and therefore increase safe use.



## 2. Proposal for amendment of the Machinery Directive 2006/42/EC, Annex I

### Current text 2006/42/EC, Annex I

#### 1.7.4. Instructions

All machinery must be accompanied by instructions in the official Community language or languages of the Member State in which it is placed on the market and/or put into service.

The instructions accompanying the machinery must be either 'Original instructions' or a 'Translation of the original instructions', in which case the translation must be accompanied by the original instructions.

By way of exception, the maintenance instructions intended for use by specialised personnel mandated by the manufacturer or his authorised representative may be supplied in only one Community language which the specialised personnel understand.

The instructions must be drafted in accordance with the principles set out below.

### Proposal for amendment 2006/42/EC, Annex I

The proposed changes are in red and italic.

#### 1.7.4. Instructions

All machinery must be accompanied by instructions in the official Community language or languages of the Member State in which it is placed on the market and/or put into service.

*The instructions must be in a form that is readily accessible to the operator.*

The instructions accompanying the machinery must be either 'Original instructions' or a 'Translation of the original instructions', in which case the translation must be accompanied by the original instructions.

By way of exception, the maintenance instructions intended for use by specialised personnel mandated by the manufacturer or his authorised representative may be supplied in only one Community language which the specialised personnel understand.

The instructions must be drafted in accordance with the principles set out below.

*It is allowed that the machinery is accompanied with simplified instructions (in printed format), provided that:*

- a) The full text of the instructions are available by another means, free of charge*
- b) The full text of the instructions remain available for at least 10 years after the end of production of the machinery*
- c) The simplified instructions do not contradict the full text of the instructions*

*The content of the simplified instructions must at least include the information as indicated in (1.7.4.2.1)*



### 1.7.4.2.1. Contents of the simplified instructions

Each simplified instruction manual must contain, where applicable, at least the following information:

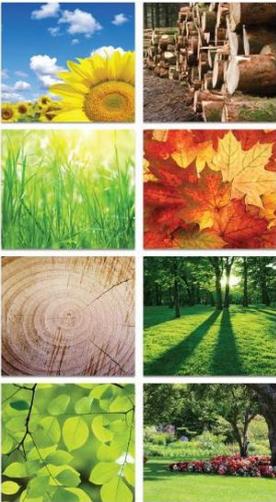
- a) Information where the full text of the instruction can be obtained
- b) the business name and full address of the manufacturer or of its authorised representative;
- c) the designation of the machinery as marked on the machinery itself, except for the serial number (see section 1.7.3);
- d) a general description of the machinery;
- e) a description of the intended use of the machinery;
- f) warnings concerning ways in which the machinery must not be used that experience has shown might occur;
- g) assembly, installation and connection instructions;
- h) instructions for the putting into service and use of the machinery and, if necessary, instructions for the training of operators;
- i) instructions on the protective measures to be taken by the user, including, where appropriate, the personal protective equipment to be provided;

## 3. Examples of simplified instructions





For further information, please contact: EGMF Secretariat, [secretariat@egmf.org](mailto:secretariat@egmf.org)



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*The European Garden Machinery Industry Federation – EGMF – has been the voice of the entire garden machinery industry in Europe since 1977. With 31 European corporate members and 7 National Associations representing manufacturers of garden, landscaping, forestry and turf maintenance equipment, we are the most powerful network in this sector in Europe.*

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