

EGMF Position Paper on areas of improvement for the Machinery Directive

Executive Summary

EGMF, the European Garden Machinery Federation, would like to present its proposals to improve the Machinery Directive from a practical point of view, following the outcome of the consultation process and the consultant's findings in the final report of the study on the evaluation of the MD. It was clearly identified that one area of improvement of the Machinery Directive or one question which should be considered in the revision process is the Directives' fitness for purpose in relation to new technologies, innovation etc. In this respect, EGMF has stressed on various occasions during the evaluation study that the Machinery Directive should be further adapted to modern means of providing information and documentation which demonstrate a product's conformity to its essential requirements.

In other words, the garden machinery industry is putting forward two key proposals to be considered during the review of the Machinery Directive:

- a quick start Guide in the form of essential instructions to accompany a machine while the full instructions are provided by electronic means
- a simplified Declaration of Conformity to accompany a machine, providing the web link where the complete Declaration of Conformity (DoC) is available, which is already permitted in the Radio Equipment Directive.

The quick start guide and the electronic DoC represent an administrative improvement which would not be difficult to implement and would in turn bring uncontested benefits to businesses that opt for supplying the instruction handbook and the full DoC electronically, keeping the same level of safety and quality: saving time and costs, enhancing communication with end-users, reducing the environmental impact of printed instructions, to name a few.

The two proposals will be further elaborated in the sections below.

1. Proposal of a Quick Start Guide and e-instructions

Under the Machinery Directive but also other product safety 'New Approach' legislation, instructions for use are generally required to accompany a product when it is placed on the market. Although the format of this documentation is not specified, it is commonly understood that the instructions will be provided on paper.

EGMF would like to propose that a simplified paper version of instructions (a quick start guide) is provided with the machine, while the complete instructions can be made available electronically (e.g. on the manufacturer's website). A Quick Start Guide is a document which describes the initial assembly, preparation and normal operation of a new machine. This document does not remove the availability of the instruction handbook on paper, if requested by the customer. When delivered with the product, the QSG includes information about where to find the full instructions by other communication means or where to request the full instructions on paper.

EGMF is of the opinion that the future Machinery Directive should embrace modern means of communication as regards the supply of instructions, thereby allowing the full manual to be available online, and at the same time providing safety essential information to end-users via a printed quick start guide. Current technologies give the possibility to greatly enhance the content of the full

instructions, using photographs, integrated images, videos, animations and even augmented reality. These technologies can be provided free of charge on the manufacturer's website and would be easily accessible by smartphone, laptop and/or tablet. Upon request, the full instructions can also be provided to end-users on paper (note: for additional paper copies, charges may apply).

Instructions available electronically would not only be more user-friendly but also reduce the environmental footprint. The consumer perceptions of paper instructions and the environmental impact of paper formats are not to be disregarded.

- Consumer behaviour

Studies on consumer behaviour have shown that ¹approximately 40% of consumers never read the instructions and try to use the product without external help, and about 33% of consumers read only part of the instructions since many customers think that ²"instruction manuals are too technical, too complicated and too difficult to read" (Gebert 1988).

- Environmental impact

Paper production and use prompt important environmental concerns. In the lawn and garden industry, on average over 20 million products are produced each year for use in the European Union. For example, one instruction handbook for a lawnmower paper has approximately 50 pages and is translated into 24 languages for a total of 1200 pages per machine. Based on EGMF companies' experience, it is estimated that approximately between 10,000 and 100,000 A4 sheets of paper may result from one tree. Moreover, paper production and use is a major contributor to greenhouse gases (more than the global aviation industry) and to climate change emissions (more than international transport). ³The Environmental Paper Network also found that producing one tonne of paper from wood needs approximately 98 tonnes of resources and uses as much energy as the production of one tonne of steel.

Bearing in mind the consumer behaviour arguments and the environmental impacts, it is beyond doubt that the electronic instructions combined with a quick start guide are both much more user-friendly and environmental-friendly than the complete paper version. At the same time, this initiative would be in line with the objective of further adapting the Machinery to digital technologies and innovations, which is one of the areas of improvement highlighted in the findings of the evaluation study.

The minimum content of the QSG must consist of:

- Product identification and sources of information
- Contents of the package delivered to the user (if applicable)
- Instructions for the final assembly of the product (if applicable)
- Applicable safety warnings
- Instructions for operating the product

The information included in the Quick Start Guide must by no means contradict the content of the full instructions. Consequently, it is fundamental that symbols used in the Quick Start Guide are identical to those used in the full instructions, to avoid any misunderstandings potentially resulting in the wrong

¹ Wieser-Sauer-Ruettinger, 2004, Consumers' use of written product information

² Gebert, D. 1988, Gebrauchsanweisungen als Marketing-Instrument

³ EPN findings: <http://www.environmentalpaper.eu/tools-resources/paper-facts/>

use of the product. The Quick Start Guide will provide the contact information for accessing the full instructions, for example Quick Response (QR) codes.

The detailed explanation of the minimum content is described in Annex I to this paper.

2. Proposal of a simplified DoC, combined with the full DoC online

Under the Machinery Directive, the manufacturer is required to affix the CE marking on his/her machine and draw up a written Declaration of Conformity that accompanies this machine before it is placed on the market.

Taking the current evaluation of the MD as an opportunity to make it more efficient and adapted to modern means of communication, EGMF believes that it should be allowed that a product is accompanied by either a copy of the DoC or a simplified DoC. The latter would declare that the machine in question is compliant to the Machinery Directive, and refer to the internet address where the full text of the DoC is available, in the language or languages where the machine is placed on the market or made available.

This provision is already set out in the Radio Equipment Directive (see articles 10.9; 18; Annex VII). As part of the objective to align the MD with the NLF, the Machinery Directive should consider this provision which is already set out in Radio Equipment Directive (see articles 10.9; 18; Annex VII). The content of the simplified DoC is to contain the following: *“Hereby, [Name of manufacturer] declares that the radio equipment type [designation of type of radio equipment] is in compliance with Directive XX. The full text of the EU declaration of conformity is available at the following internet address...”*

Conclusion

In the framework of the evaluation of the Machinery Directive, this paper has elaborated on two EGMF proposals aimed at further adapting the Machinery Directive to accommodate electronic means of communication and new technologies, when supplying relevant documentation to end-users and authorities. To sum up, the essential instructions for use covering the health and safety risks would continue to be supplied with the machine in the printed quick start guide thereby ensuring the safe use of the machine, while the instructions' handbook would be available either through electronic media or as paper copy, upon request. The simplified DoC declaring that the machine is compliant would specify the internet address where the complete DoC is available. If considered, both proposals would imply minimal changes to the Machinery Directive, while generating important benefits: further efficiency and better communication with end-users, reduced burdens and lower environmental footprint.

Annex I

Quick Start Guide: minimum content

1. Identification and sources of information

This section provides identification details of the product and must include:

- A reference, including the address (telephone number, postal address, internet link or QR code or any other electronic means) where the complete instructions can be obtained
- The manufacturer's name of the machine
- The designation of the machine (model name/number)
- A picture or drawing of the fully assembled machine indicating the location of the model name/number and serial number

2. Contents of the package (if applicable)

This section indicates all the loose parts and tools (if any) supplied with but not installed on the machine at the time of purchase. If applicable, the QSG must indicate that there are certain loose parts that need to be installed before the machine can be operated. The following images/symbols must be indicated:

- The main machine
- The parts to be installed
- The fasteners to be used for installing the parts (including the indication of the required tightening torque if necessary)

3. Initial assembly

How to assemble the machine

- The parts to be installed
- Tightening of screws etc.
- Liquid levels or quantities to be added (if applicable)
- Use of extension cables (if applicable)

4. Safety warnings

This section provides an explanation of all safety warnings and safety symbols located on the machine that are important to understand prior to initial use. As a minimum, this should include (as applicable):

- A warning to read the QSG and complete instructions in order to understand the working procedures of the product
- All warnings needed for the specific product e.g. according to the relevant harmonised standard

5. Instructions for use

Using clear pictograms indicating exactly where and what action is required by the user, this section provides details on:

- The steps required to prepare the machine for initial use

- The steps required for starting/stopping the machine
- How to use the machine under normal conditions [including any stability requirements]. It is recommended that the steps required to use the product are listed in sequence, potentially with sub-sections, using pictograms
- Where to find information on storage and maintenance

Any additional information may be included at the discretion of the manufacturer.

Annex II

REFERENCES TO LEGAL REQUIREMENTS

Machinery Directive

The Machinery Directive 2006/42/EC, as amended by Directive 2009/127/EC, states in article 5.1.c that the manufacturer shall provide the instructions when placing the product on the market.

More specifically, annex I, point 1.7.4.1 states:

“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.”

This confirms that providing instructions is a mandatory requirement, but the form in which these instructions must be made available is not specified. This is reiterated in the European Commission Guide for application of the Machinery Directive, 2nd edition dated June 2010, in §255.

§255 The form of the instructions

“Section 1.7.4 does not specify the form of the instructions. It is generally agreed that all health and safety related instructions must be supplied in paper form, since it was previously assumed that not all users may be able to access the internet or have the technical means of reading instructions supplied in electronic form. However, it is often useful for the instructions to be made available in electronic form and on the Internet as well as in paper form, since this enables users to download the electronic file if they choose and to recover the instructions if the paper copy has been lost. This practice also facilitates the updating of the instructions when this is necessary.”

It should be noted that other European safety legislation, such as the Low Voltage Directive 2014/35/EU and the Electromagnetic Compatibility Directive 2014/30/EU, has similar wording.

European Standard EN ISO 12100:2010

EN ISO 12100:2010 is an A type and listed as a harmonised standard under the Machinery Directive. When applied in combination with the relevant C type harmonised standards, it provides a presumption of conformity to the Machinery Directive.

The standard recognises the availability of various means (e.g. electronic) to provide the instructions to the user. Nevertheless, a paper copy of the instructions must be available in order to communicate the essential safety issues to customers / end-users. Note that the electronic form is considered as a backup to the paper copy.

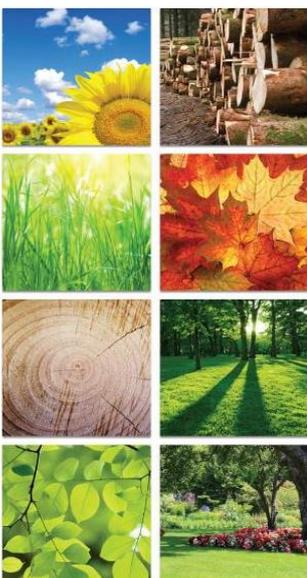
Clause 6.4.5.2.c of EN ISO 12100:2010 states:

“Safety-relevant instructions which involve immediate action should be provided in a form readily available to the operator.”

Furthermore, clause 6.4.5.3.e states:

“Durability and availability of the document: documents giving instructions for use should be produced in a durable form (i.e. they should be able to survive frequent

handling by the user). It can be useful to mark them “keep for future reference”. Where information for use is kept in electronic form (CD, DVD, tape, hard disk, etc.), information on safety-related issues that need immediate action shall always be backed up with a hard copy that is readily available.”



For further information, please contact:

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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 30 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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