

# The ongoing revision of the Machinery Directive and its importance for the lift sector

February 2022

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The Machinery Directive is being revised: 15 years have passed since the release of 2006/42/EC, and, like all things, the text of the Directive has also aged. The current need for a new Machinery Directive, reflecting the current market, stems primarily from the need to adapt to new and future technological developments such as AI and the like. This is necessary because it is possible that in ten years' time new technologies will emerge which will also have an impact on other aspects, such as the safety of a machine, giving rise to problems; the Directive is not often amended, so it is crucial that these future eventualities are already taken into due account, also given the speed at which the market evolves and the emergence of new technologies developments. The ongoing revision is then a good opportunity to correct some things that were not clearly written in the previous Directive, or that were written leaving too much room for interpretation.

There is no doubt that the Machinery Directive is fundamental for the lifts and lift industry. First of all, its importance derives from the fact that the Lifts Directive itself has its basis in the Machinery Directive; and secondly because, in recent years, the product defined as "lifting platform" (i.e. those lifting systems for persons and/or goods with a speed of 0.15m/s), especially for SMEs, has become more and more central compared to the lift product, which on the other hand is increasingly in the hands of the big players in the sector. This is because lifts are much more standardised than platforms, so it is easier for multinationals and large companies to have low costs thanks to industrialised production, and to remain highly competitive thanks to the standardisation of the system. This is true for the new market all over the world, and in Europe for sure, where multinational companies tend to dictate prices. On the other hand, the platform remains a highly customisable facility, and a sector within which SMEs are the main player thanks to their creativity and adaptability.

It is thus clear that we must not wait passively for the new text to come out, but rather work to make it less negative for lift SMEs.

Since the release of the 2019 public consultation by the European Commission, SBS and EFESME (the European Federation representing SMEs in the lift sector, and one of the founding members of SBS), have submitted comments and proposals to guarantee lift SMEs a central and not marginal place after the adoption of the new text.

Firstly, an attempt has been made to correct the approach of the text of the current Directive where it speaks of lifting platforms with fully enclosed load support, which for too many years has been interpreted differently from country to country by the notified bodies themselves.

The decision to make it possible **to deliver the documentation of the installations** in digital form was also supported; nevertheless, what is important for lift SMEs is that, upon request, giving the documentation to the client and consumer also in its paper format, so that a copy remains physically on site, is foreseen and possible. The availability of paper documentation, which immediately becomes mandatory upon the customer's request, is another measure to continue to ensure fair competition and access to the needed

information - not all SMEs are technologically savvy and some European countries are still experiencing difficulties in internet coverage and therefore in accessing information. As such, the ability to rely on both digital and paper supports is highly appreciated.

There was also much discussion about **the risks posed by machines that are interconnected with the outside world**, and the risk that this could create hazards for the end users of the installations and for the maintainers themselves.

It is important to pay the utmost attention to this subject, both in terms of security and of the market. In terms of safety, because we know very well how fast new technologies evolve. Even if manufacturers are required to guarantee the safety of their machines throughout their entire life cycle, how can one guarantee that in one, two or five years there will be no technologies that could jeopardise safety? From SMEs' point of view, this is very dangerous, and it is therefore important that the interconnections between the machine and the outside world are always monitored and approved by the owner in accordance with the installation manual and all the information supplied by the manufacturer at the time of delivery of the installation.

From the market's point of view, this could be very dangerous. It is known, or at least it can be duly expected, how much of an impact the research and programming of software to guarantee the safety of a machine can have. If, on the one hand, the big players in the lift market can make available significant budgets and human resources dedicated to this purpose, it is clear that SMEs will struggle to stay in the market on this point. The risk is that they will be driven out of the market or remain there only as simple executors of maintenance procedures, as stated above.

Finally, it is important to consider the **Commission's proposal to transform the Machinery Directive into a Regulation on machinery products**. This could also be an advantage for lift SMEs, because it would standardise the machinery market across Europe, and remove the discretion of implementing laws in individual countries. This should have relative advantages on the free movement of goods in the European Union, thus also favouring exports and guaranteeing lift SMEs a valid level playing field in all 27 member states where they can prosper and be increasingly important market players. These relative advantages occur, of course, if the Regulation is well written with due consideration for the various positions, and if its translation into the various official languages of the European Union is done in strict compliance with the original text.

It is clear that SBS and its members, EFESME in this case for those machines that fall within the lift sector, must remain alert to this important dossier and continue to work to ensure that its final version is a tool to allow SMEs to work at their best, without further burdens complicating their daily work.

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Small Business Standards (SBS) is the European association representing and supporting small and medium-sized companies (SMEs) in the standardisation process, both at European and international levels.