



## CECIMO position paper Is the Machinery Directive fit for purpose?

Brussels, 14 July 2020

### Introduction

In the context of the ongoing revision of the Machinery Directive and considering the adoption of a new legislative proposal in the beginning of 2021, CECIMO, representing the machine tool industry and related Manufacturing Technologies, believes that the Machinery Directive, taking everything into consideration, is a sound piece of legislation and that, consequently, any future revision should be **characterised by continuity rather than revolutionary changes**.

In this position paper, we would like to specifically address three subjects which, on our road to a new legislative proposal, have gained in importance: namely **artificial intelligence, cybersecurity and digital documentation**.

### Artificial Intelligence and cybersecurity

**Artificial Intelligence (AI)** is not a novel subject but it has, in many sectors, considerably evolved during the last decades. However, in our sector, this evolution has been less rapid and consequently AI is still at an early development stage. Additionally, AI has a limited scope of application in our sector, for example optimisation, predictive maintenance and condition monitoring.

As the digitisation of our sector is growing, **cybersecurity** has the potential to become a major issue. However, manufacturers have not remained passive. They are already today addressing many potential cybersecurity risks by deploying different kinds of countermeasures, for example advanced firewalls and virus scanners as well as providing safe and secure access to critical data and parameters.

We are of the opinion that the Machinery Directive's **current essential health and safety requirements** are defined adequately, in a **general and technology-neutral way**, and that they therefore are fit for purpose and remain valid when considering technological developments. Hence, there is no need to revise the Machinery Directive as it is already today able to adequately address both AI and cybersecurity.

Moreover, AI and cybersecurity are both horizontal subjects that are not limited to the machinery sector and therefore they **should be tackled in a horizontal manner**, rather than trying to introduce such requirements in the Machinery Directive. Also, if a sector is covered by **several pieces of legislation (both horizontal and vertical)** concerning the same subject, this could for example create some confusion regarding which requirements manufacturers would need to fulfil. Finally, **"one size fits all" approaches** should be avoided for both AI and cybersecurity as their respective scope of application vary widely in the different sectors.



We believe that harmonised standards, which are used by manufacturers to demonstrate that their products comply with the Machinery Directive, are better suited instruments to manage technological developments, as they reflect the state of the art. If a harmonised standard does not anymore reflect the state of the art, a revision would be required but this revision represents a less cumbersome and faster procedure than the adoption of a new legislative proposal integrating new essential health and safety requirements, which anyhow would be unnecessary as the existing ones remain valid. The Guide<sup>1</sup> also represents a more valid alternative to manage technological developments than the revision of the Machinery Directive.

## Digital documentation

The possibility to allow **digital documentation** is welcomed by our sector. There are many advantages in the use of digital documentation, both for manufacturers and customers. It enables for example manufacturers to offer up-to-date documentation for use in a safe, easy, instant and continuous manner. Digital documentation also represents an opportunity for the manufacturers to reduce their environmental footprint by avoiding the distribution of printed documentation. Finally, it provides for example customers with an increased searchability, which is vital in the case of an incident.

We believe that manufacturers should remain free to select which documentation should be offered in a digital format and via which kind of channels they should be distributed. This needs however to be done in a manner that ensures that all the relevant requirements of the Machinery Directive are fulfilled and that the required information is communicated in a proper manner.

We are of the opinion that the best way forward to enable digital documentation is not a revision of the Machinery Directive but rather the introduction of some additional explanations and clarifications in the previously mentioned Guide.

**As a conclusion, concerning the three subjects addressed in this position paper (Artificial Intelligence, cybersecurity and digital documentation), we believe that the Machinery Directive is fit for purpose and that therefore a revision is not required.**

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<sup>1</sup> [The Guide to application of the Machinery Directive 2006/42/EC](#)



# cecimo

European Association of the Machine Tool Industries  
and related Manufacturing Technologies

## About CECIMO

CECIMO is the European Association of the Machine Tool Industries and related Manufacturing Technologies. We bring together 15 national associations of machine tool builders, which represent approximately 1500 industrial enterprises in Europe (EU + EFTA + Turkey), over 80% of which are SMEs. CECIMO covers 98% of the total machine tool production in Europe and about 35% worldwide. It accounts for more than 150,000 employees and a turnover of around 27 billion euros in 2019. More than three quarters of CECIMO production is shipped abroad, whereas half of it is exported outside Europe.

The machine tool sector is a supplier of high technology manufacturing equipment and products to the European and international manufacturing industries, including automotive, aerospace, ship building, power generation and the medical sectors.

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