

## ADVOCACY PLAN

### [Machinery Regulation]

What is the issue and why is it important? (max 200 words)			
<p>The Machinery Directive is a core piece of EU legislation for the companies we represent in the mechanical engineering industry, providing a stable legal environment. Orgalim followed the whole legislative process to ensure that its revision and transition to a Regulation respected the NLF principles and provided an equally stable and predictable legal structure.</p>			
Key Orgalim objectives			
1. Maintain Module A for conformity assessment			
2. Maintain strong industry influence in standards development			
3. Maintain coherence with other legislation (AI Act; GPSR)			
Institutional Process/Advocacy milestones			
When	Development	Orgalim advocacy	Members' advocacy suggestion
Feb 2019 – Apr 2021	Inception Impact Assessment and Public Consultations	Early engagement with EC including through <a href="#">response to the IIA</a> and <a href="#">public consultation</a> , and through two letters calling for appropriate transition period and avoiding third party certification for all annex IV	
21 April 2021	Commission publication of legal proposal	Orgalim provided <a href="#">comments</a> to the proposal	
October 2021 – May 2022	EP report on the Machinery Regulation	Orgalim held several meetings with MEPs and Attachés in Perm Reps throughout the process of internal negotiations, providing suggestions for amendments, voting recommendations and a <a href="#">FAQ doc</a> on mandatory third party certification. Orgalim led a <a href="#">joint industry statement</a> on priorities for the MR.	
17/06/2022	Council negotiation mandate		Engagement with own governments
July – Dec 2022	Trilogue negotiations	Orgalim provided recommendations for trilogue negotiations, including a position paper on <a href="#">common specifications</a>	

18/04/2023	EP plenary vote on final text	Orgalim provided voting recommendations	
22/05/2023	Council approval of final text		Engagement with own governments
29/06/2023	Publication in the OJEU		
20/01/2027	Entry into application	Orgalim is working on the technical implementation aspects, including the development of standards and the update of the guide to application.	

### Key decision-makers (10 max)

Name	Institution / Role	Rationale	Relationship w/ Orgalim
Gwenole Cozigou	DG GROW / Director (Dir. H)	Director responsible for the Standards policy Unit	Met few times
Mehdi Hocine	DG GROW, Head of Unit	Responsible for the revision of the Machinery legislation	In regular contact with Orgalim, participates to Orgalim TF meetings and other activities regularly.
Peter Boertjes	DG GROW, Desk Officer	Officer directly involved in the drafting of the Regulation	In regular contact with Orgalim, participates to Orgalim TF meetings and other activities regularly.
Nikos Michailidis	DG GROW, Legal officer	Officer directly involved in the drafting of the Regulation	Met few times
MEP Ivan Štefanec	European Parliament / EPP, Slovakia	Rapporteur	In regular contact with assistant, organised stakeholder meeting where Orgalim was invited as speaker
MEP Svenja Hahn	European Parliament / RE, Germany	Shadow Rapporteur	Met on 15/06/2021 and in regular contact with assistant afterwards.
MEP Adriana Maldonado López	European Parliament / S&D, Spain	Shadow Rapporteur	Met on 18/11/2021, shared position papers.
Fausto Matos	European Parliament / EPP, Policy Advisor	Strong influence on the EP drafting	In regular contact with Orgalim. Shared position papers.

### Lessons Learned

#### Orgalim's key achievements

- No reference to AI systems (decoupling from the AI act) & deletion of 'high-risk' term
- Annex I (list of machinery categories subject to third party certification) divided in two parts. Part A (with obligatory 3<sup>rd</sup> party certification) only includes 6 machinery categories. Orgalim members that manufacture machines in Annex I are not included in part A.

- EC empowerment to adopt common specifications in the absence of harmonised standard applying only under exceptional conditions and upon consultation of relevant experts
- Digital documentation (DoC, instructions) explicitly permitted
- Transition period & application of 42 months (after the entry into force) – 1 year later than the EC proposal

#### **Open concerns**

- New essential requirements in Annex III (on protection against corruption, risk of contact with overhead power lines, supervisory function, repeated shock vibrations, seating etc.) are considered quite stringent by manufacturers. Clarity on their interpretation should be provided in a future update of the Machinery Guide.

#### **Lessons learned**

Orgalim's advocacy on the machinery regulation has been overall very successful and has contributed to a balanced legal text that will be the main reference for machine manufacturers for the years to come.

At Council level, Orgalim has been confronted with some hurdles in terms of the dialogue with the two Council Presidencies during the legislative process and with the Council's contacts in general. A more active engagement of Orgalim members at national level, in coordination with the Secretariat, will be beneficial to maximise Orgalim's influence and impact at national level in the implementation phase.

At the Parliament level, Orgalim secured a solid and smooth cooperation with the Rapporteur's office, which has been crucial in gathering intelligence and submitting timely feedback.