

## POSITION PAPER

Brussels, [19 February 2020]

### Orgalim Comments to EMC Directive Roadmap

Orgalim represents Europe's technology industries – innovative companies spanning the mechanical engineering, electrical engineering and electronics, and metal technology branches.

Orgalim believes that the EMC Directive:

- is generally fit for purpose and we see no need for modification or revision at this stage
- is not a "safety directive", meaning that the Directive is not supposed to deal with the safety of equipment
- should be kept technology neutral
- should not be merged with other NLF Directives (eg RED)

Moreover, Orgalim opposes any change to the scope of the Directive, such as the inclusion of cables, as well as any change to the essential requirements.

We strongly believe that harmonised standards are the best means for addressing existing, as well as emerging technologies, such as AI, 5G etc. The directive should continue to specify only the high-level essential requirements.

Our industry values the EMCD for its legal stability and predictability. We firmly believe that any lack of clarity can be addressed in guidance documents without revising the EMC Directive.

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*Orgalim represents Europe's technology industries: companies that innovate at the crossroads of digital and physical technology. Our industries develop and manufacture the products, systems and services that enable a prosperous and sustainable future. Ranging from large globally active corporations to regionally anchored small and medium-sized enterprises, the companies we represent directly employ 11 million people across Europe and generate an annual turnover of around €2,000 billion. Orgalim is registered under the European Union Transparency Register – ID number: 20210641335-88.*