

Economic consequences of the revision of the Machinery Directive

Costs in terms of man/days

Orgalime expects that the revision of the Machinery Directive will entail costs in terms of additional effort for companies (expressed in man-days of qualified workers and engineers checking on the proposed changes) in the five following areas:

1. **Art. 7** means that all existing harmonised standards have to be added with an additional „table of correspondence“ = pure administrative burden.

Minimum effort: 450 standards, 10 man-days per standard = **4500 man-days**

2. **Annex I** with its new content or its new structure will affect the redrafting of existing harmonised standards (content) as well as the redrafting of the technical documentation (structure and content) of manufacturer.

2.1. Standardisation: Any change of the content of Annex I means that all existing harmonised standards have to be checked whether the changes in Annex I need to be incorporated into the standard = 95% administrative measures, 5% new safety requirements

Minimum effort: 240 standardisation working groups, 10 man-days/group = **2400 man-days**

2.2. Technical documentation: The existing technical documentation of manufacturers corresponds with the structure of the current directive. Any structural change of Annex I and of course of the content will lead to a redrafting of the technical files of all products of a manufacturer = mainly administrative burden

Minimum effort: 23.000 manufacturer, 20 technical files per manufacturer (average), 5 man-days per technical file =

2.300.000 man-days

3. **Training, information, assistance:** Manufacturers as well as customers and authorities have to be informed about the new provisions of the directive. In many cases especially for SMEs special assistance and guidance has to be provided = mainly administrative burden

Minimum effort (based on experience with the existing directive) (23.000 manufacturer, 2 persons per company (to be informed)):

- Information: 2 days per person, all manufacturers 92.000 man-days
- Assistance/guidance: 4 days per person, 10.000 manufacturer 40.000 man-days
- Internal company communication, training: 23.000 manufacturer, 5 persons per company 115.000 man-days

247.000 man-days

This means a total (1+2+3) of **2.554.000 man-days** for mainly formal and administrative provisions in the proposed directive is **too much**. This means: **2.554.000 man-days** of technical competence less for innovative work.