

EUROMOT

The European Association of Internal
Combustion Engine Manufacturers

25 YEARS
1991-2016
Promoting
Engines in Society

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Brussels, 8th February 2019

INCEPTION IMPACT ASSESSMENT ON THE MACHINERY DIRECTIVE COMMENTS FROM EUROMOT

EUROMOT, the European Association of Internal Combustion Engine Manufacturers, welcomes the European Commission's initiative to consult stakeholders in the process of evaluating and reviewing the Machinery Directive (MD).

We would like to focus on one major issue underlined in the European Commission's [inception impact assessment](#): the "lack of legal clarity in the scope and definitions", most notably in the definition of "Partly Completed Machinery" (PCM).

We would like to highlight the following point in particular: any possible modification related to the understanding of the current definition of PCM should not change the interpretation given in the European Commission's [Guide](#) to the application of the MD, whereby "***an internal combustion engine or a high voltage electric motor placed on the market ready to be fitted, i.e. with the connections necessary for the fitting, to machinery that is subject to the Machinery Directive are to be considered as partly completed machinery***" (§46, page 49). Engine manufacturers have set up the relevant systems and processes according to such interpretation, which has provided us and our customers with the necessary legal certainty to operate at best.

President:
Georg Diderich

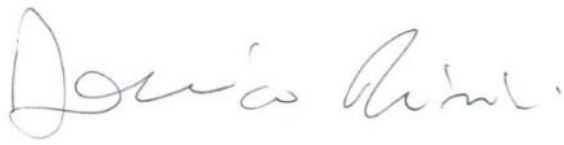
General Manager:
Dr Peter Scherm

ENGINE IN SOCIETY

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EUROMOT would like to thank the European Commission for the opportunity to comment on this inception impact assessment and reiterates its willingness to contribute to the MD review process.



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