

## **INTERGRAF and UNI EUROPA GRAPHICAL JOINT STATEMENT**

Comments to the ongoing review process of the  
2006/42/EC Machinery Directive

### **Secure access to instructions**

February 2022

Printing companies and their workers are concerned about the ongoing developments that promote **digitalisation of documents by default** and lead to a **digital only economy**.

Whereas we acknowledge that technology allows an efficient access to documents and information in digital means, the user of a machinery product should continue to have a direct access to the instructions in paper format.

In Annex III.1.7.4 on instructions of the Commission's proposal (COM(2021)202), the text gives the opportunity to manufacturers to provide instructions in digital format. The wording unfortunately does not give manufacturers any incentive to continue providing an accompanying printed manual of instructions. This proposal will lead to a situation where machinery manufacturers will only provide instructions in digital format by default.

The **burden** of finding the instructions online and printing them or the burden of asking for a paper version of the instructions now **exclusively lie with the user** of the machinery product. The smaller companies are, the heavier the burden will be.

At company level, this requires the employer to **provide the technology** to the workers to access instructions and the workers to **have the appropriate digital skills** to access instructions. In a manufacturing sector like ours, this will cause companies in general, and SMEs in particular, an additional administrative and financial burden.

We agree that instructions should be available at all times and accessing them online is an efficient way to do it. However, we do not agree that the digital format replaces the paper instructions that accompany the machinery product. The digital version should rather be considered as a **complementary tool**. The Directive should encourage manufacturers to provide an access to a digital format of the instructions in addition to the paper format.

Instructions are not only a conveyor of information on the technical or practical use of a machinery product, but they are also a key conveyor of **safety information and measures** when using the product. It is essential that this information is available by default physically with the product.

The Commission's proposal will set a dangerous precedent for future European legislation, implementing the '**digital by default**' and '**digital only**' approaches in European economy.

Misinformed policies promoting digital against the use of paper without considering the printing industry and its workers, can potentially damage demand and put jobs at risk. This measure will result in negligible cost reduction for only a few large companies at the cost of impoverishing print workers and increasing the operating costs of SMEs, while continuing to promote an uninformed perception of paper as a polluting product and digital alternatives as having no environmental consequences.

Therefore, we suggest **amending the Commission's proposal** as follows:

#### 1.7.4. Instructions

The instructions accompanying the machinery product shall be either 'Original instructions' or a 'Translation of the original instructions', in which case the translation shall be accompanied by the original instructions.

By way of exception, the maintenance instructions intended for use by specialised personnel mandated by the manufacturer or his or her authorised representative may be supplied in only one official language of the Union which the specialised personnel understand.

*In addition to the paper format*, the instructions may *also* be provided in a digital format. ~~However, upon purchaser's request at the time of the purchase of the machinery product, the instructions shall be provided in paper format free of charge.~~

~~When the instructions are provided in digital format, the manufacturer shall:~~

~~(a) mark on the machinery product and in an accompanying paper how to access the digital instructions; (b) clearly describe which version of the instructions corresponds to the machinery product model;~~

~~(c) be presented in a format that makes it is possible for the end user to download the instructions and save them on an electronic device so that he or she can access them at all times, in particular during a breakdown of the machine. This requirement also applies to a machinery product where the instruction manual is embedded in the software of the machinery product. General principles for the drafting of instructions~~

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Intergraf is the European federation for print and digital communication. We are a Brussels-based trade association and social partner representing employers in the European printing industry. Intergraf represents 21 national printing federations in 20 countries. Our primary task is to represent and advocate for the interests of the printing and digital communication industry in Europe, working with European Union to support the sector's competitiveness through advocacy, information-sharing, networking and social dialogue. For more information, please visit: [www.intergraf.eu](http://www.intergraf.eu)

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