



Market surveillance: expectations from industry

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The Italian plastics and rubber machinery industry - represented by the trade Association ASSOCOMAPLAST - has agreed positively with the new approach directives above all for the safety positive impacts in the workplaces.

The users' industry of these machines, have recorded in Fifties and Sixties, during the period of the largest growth in the plastics applications, not few and heavy accidents caused on the one hand by an inadequate machinery safety and on the other by the users' poor sensitiveness on measures and procedures for a safe work.

On the basis of what mentioned, ASSOCOMAPLAST has joined, since the beginning of the activity, the CEN Technical Committee, TC 145, for the definition of the standards related to plastics and rubber machinery safety and from 1995 the Italian Association has the Chairmanship and the Secretariat of such Committee.

The above mentioned activity, developed with the support of many national delegations, in these years has brought to the publication of the following 19 C standards:

- EN 201:1997 - Injection moulding machines
- EN 289:2004 - Presses
- EN 1114-1:1996 - Extruders and extrusion lines - Part 1: Extruders
- EN 1114-2:1998 - Extruders and extrusion lines - Part 2: Die face pelletisers
- EN 1114-3:2001 - Extruders and extrusion lines - Part 3: Haul-offs
- EN 1417:1996 - Two roll mills
- EN 422:1995 - Blow moulding machines
- EN 12012-1:2007 - Size reduction machines - Part 1: Blade granulators
- EN 12012-2/A1:2003 - Size reduction machines - Part 2: Strand pelletizers
- EN 12012-3:2001 - Size reduction machines - Part 3: Shredders
- EN 12012-4:2006 - Size reduction machines - Part 4: Agglomerators
- EN 12013:2000 - Internal mixers
- EN 12301:2000 - Calenders
- EN 1612-1:1997 - Reaction moulding machines - Part 1: Metering and mixing units
- EN 1612-2:2000 - Reaction moulding machines - Part 2: Reaction moulding plant
- EN 12409:1999 - Thermoforming machines
- EN 13418:2004 - Winding machines for film or sheet
- EN 15067:2007 - Film converting machines for bags and sacks
- EN 14886:2008 - Band-knife cutting machines for block foams

The European machinery manufacturing industry has complied properly with these standards and adoption has certainly involved a steady increase in production prices, estimated by some experts approximately of 7-12% on the single machines basic price at the time of Machinery Directive adoption.

It has to be also pointed out that the safety requirements standards' application by the designers is not easy, considering that there are often interpretation doubts which can be clarified only if there is a deep knowledge of the whole normative system, from the Machinery Directive to level B standards, which specific type C ones refer to.

Unfortunately, against an effective standardization activity which has allowed to publish the 19 mentioned standards, on the European market the expected results have been achieved only very partially.

In fact, while the Italian and other European countries' machinery manufacturers have applied the new approach directives and type C standards published on the Official Journal, the parallel increasing import of machinery from third countries shows - first of all from P.R. of China - that, although CE marked, these machines do not comply with the standards.

I do not intend on this occasion to indicate as leading negative character the Chinese imports but it is true that in the last years a growing number of European plastics converters have bought Chinese injection moulding machines appropriate for non-high-tech applications, because of the favourable price/quality rate.

Some checks made in Italy by the Customs Authorities, on demand and with the support of ASSOCOMAPLAST technical inspectors, highlighted that many times the EC declarations of conformity issued by the Chinese branch offices of very well-known notified bodies have not been often used in a proper way by Chinese exporters.

In this situation, ASSOCOMAPLAST has carried out several technical seminars in Shanghai and in Beijing - some of them in cooperation with the local Association CLIMA (China Light Industry Machinery Association) - in order to point out the relevant clauses in detail of the New Approach Directives and, in particular, the application of C standards, as EN 201:1997 concerning injection moulding machines.

Such technical seminars have achieved a remarkably good result, by demonstrating that some inappropriate applications of CE marking by Chinese manufacturers have been made in good faith, due to a lack of detailed knowledge of the standards and their correct interpretation. In fact, instances of technical cooperation between European experts and Chinese manufacturers interested in implementing the safety measures in their machines have been fostered by the seminars.

I have also to remind a proposal of the European Committee EUROMAP, which ASSOCOMAPLAST belongs to, towards the European Commission representative in Beijing, that has suggested a frame-agreement with the Chinese standardization body for a correct and very large circulation and dissemination of the European standards.

A further action carried out by the Italian Association has been done towards the plastics and rubber processors, to contribute to spread the safety culture in the workplaces.

In this frame, a CD has been put at processors' disposal as guide to the consultation of safety requirements standards on the main machines.

Moreover, on the occasion of the exhibitions devoted to the plastics and rubber industry, some special technical inspections have been carried out, in order to verify the application of safety standards on the displayed machines. That because, even though it is possible to show machines

without CE marking, it is nevertheless required to clearly state to the visitor that these machines cannot be placed in the European market.

Particularly, at PLAST'09 - the second European trade exhibition after K on Düsseldorf - organized by ASSOCOMAPLAST that will be held from 24.3 to 28.3.2009 in Milan, an effective (and I hope quite efficient) surveillance action will be working since the move-in period of the show.

Considering all stated, it is clear the proactive action carried out by ASSOCOMAPLAST and by the other trade Associations in other European countries but it is evident that these actions are not enough and during these years, unfortunately, any improvement has been shown in the domestic market surveillance by the national authorities.

For these reasons, the machinery manufacturers are waiting for actions by the European Community for a strengthening of the customs surveillance and much more inspections in the workplaces that could represent a real obstacle to the entrance and use of non-safe machinery for the plastics and rubber industries workers.