



FEM

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Implementation of machines in a loading area

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1. Intention of this guideline

The intention of this guideline is to create an unambiguous summary of the requirements for users, designers, suppliers.

This guideline will ensure equipment is supplied in compliance with applicable Directives for the safety of end users.

This document considers the requirements for products placed on the market in the EU's extended Single Market, in order to meet CE requirements.

At the time of writing, the general requirements to place products on the market within Great Britain match the CE requirements. Until 1st January 2023, the product must be accompanied by either; a UK Declaration of Conformity/Incorporation and UKCA mark, or; EC Declaration of Conformity/Incorporation and CE mark. From 1st January 2023 the product must be accompanied with a UK Declaration of Conformity/Incorporation, and UKCA mark, rather than the CE equivalent.

2. Background

The Machinery Directive is clear in its requirements for the need to provide a Declaration of Conformity for machines, however there can be ambiguity in the interpretation of this requirement when machines are used alongside, and even interlocked with other machines.

Under § 38 in the Guide to application of the Machinery Directive it states:

"A group of machines that are interconnected but in which each machine functions independently of the others is not considered to be an assembly of machinery in the above sense."

In this context, it states in particular with regard to safety:

"Even a single production line may be divided into separate assemblies and/or machines if there is no safety relationship between the assemblies or machines making up that production line."

3. What is a loading area?

A loading/unloading area is an area within a building or facility where vehicles are loaded and unloaded.

The vehicles are normally loaded/unloaded with either; a dock leveller, scissor lift or bridging plate. The loading/unloading application takes place on/around the envelope of the building.

Normally a door and dock shelter is installed in this area. This door can be hand operated or power driven.

For extra safety measures hand operated wheel chocks (with or without a sensor for wheel detection) or an automated restraint can be present.

4. Definitions

Machine:

An assembly, fitted with or intended to be fitted with a drive system other than directly applied human or animal effort, consisting of linked parts or components, at least one of which moves, and which are joined together for a specific application. (Machinery Directive 2006/42/EC, Article 2)

Composite Control Panel:

A control panel designed to allow the operation of multiple pieces of equipment from one single panel, eliminating the need for separate control panels for each piece of equipment.

5. Individual loading and unloading process

The user must be aware that individual loading and unloading process requires a risk assessment; this is independent of the safety of the machine(s).

The user is responsible for this.

6. Machines in loading area

The below intends to define typical scenarios seen within loading & unloading areas, but is not considered exhaustive.

Scenario 1; Complete machine supplied for use on its own, or multiple machines supplied for use by their own control systems which are independent to each other (not a composite control panel, not interlocked)

For example;

- Dock Leveller, or;
- Door, or;
- Dock Leveller & Door on the same dock, but operated using separate control panels.

In this scenario, each machine is considered a separate machine to the other.

Requirement of Machinery Directive: Each machine requires its own technical file and design risk assessment, and must be supplied with its own Declaration of Conformity and CE label.

Responsibility: Machine manufacturer / Person responsible for placing on the market.

Scenario 2; Multiple machines supplied for use by their own control systems which are interlocked

For example;

- Dock Leveller & Vehicle Restraint operated using separate control panels, but interlocked such that the Dock Leveller will only operate once the Vehicle Restraint is in place.

In this scenario, each machine is considered a separate machine to the other.

Requirement of Machinery Directive: Each machine requires its own technical file and design risk assessment, and must be supplied with its own Declaration of Conformity and CE label.

Responsibility: Machine manufacturer.

Interlocking to be performed in accordance with manufacturers specification. Responsibility: Installer / Specifier / Person responsible for placing on the market.

Scenario 3; Multiple machines supplied for use by a combined / composite control system

For example;

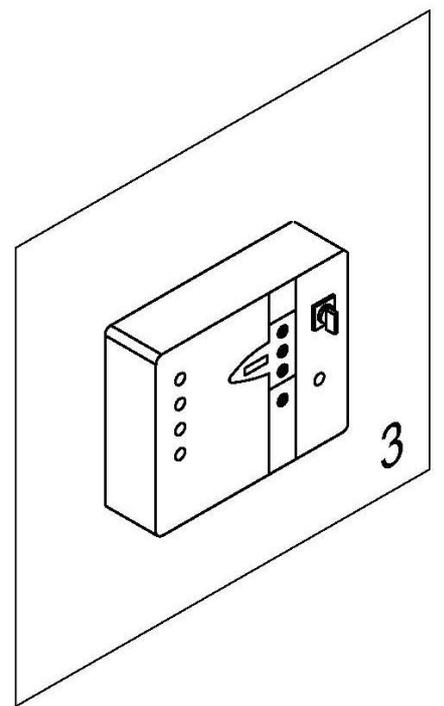
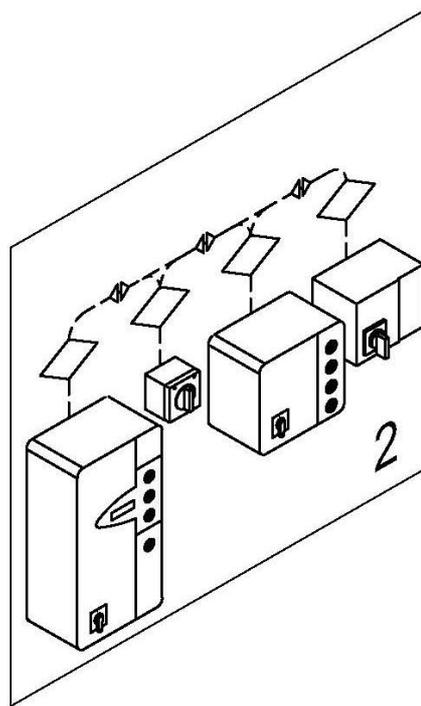
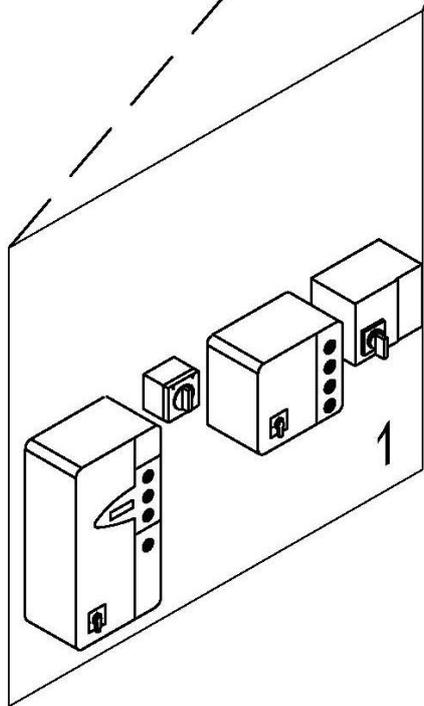
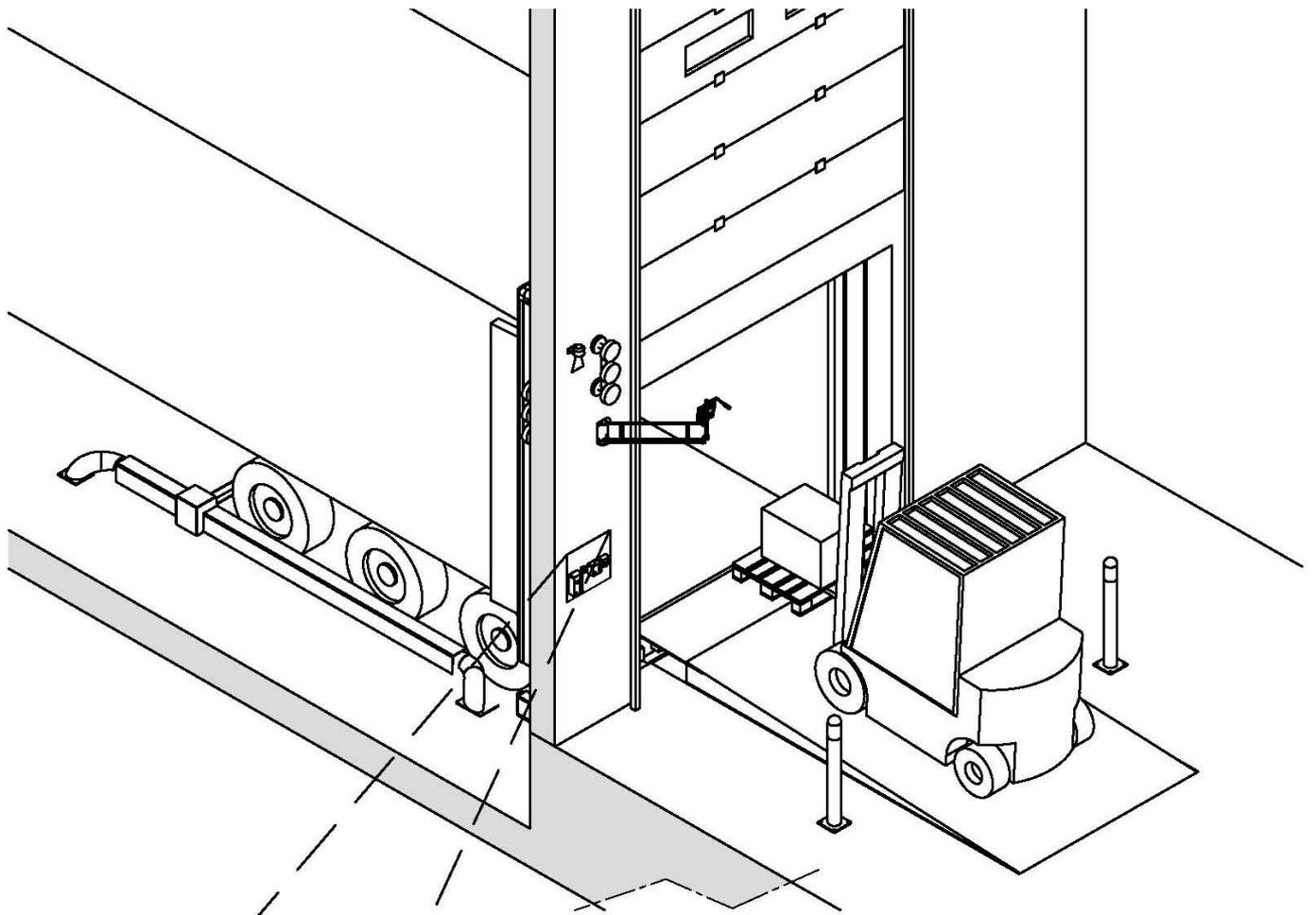
- Dock Leveller & Vehicle Restraint operated using a combined/composite control panel, such that the Dock Leveller will only operate once the Vehicle Restraint is in place.

In this scenario, the individual machines are considered to have been combined into one single machine.

Requirement of Machinery Directive: Declaration of Conformity, risk assessment and CE label required for the complete installation. Responsibility: Manufacturer/installer/specifier/designer of the control panel; "Integrator".

Each individual machine requires either a Declaration of Conformity (if the machine is supplied as a complete machine), or a Declaration of Incorporation (if the machine is supplied as a partially completed machine) & the composite control panel will require its own Declaration of Conformity clarifying what machines it is compatible with. Responsibility: Machine manufacturer / Person responsible for placing on the market.

It should be noted that a combination of scenarios is possible.



The recommendations and advice contained in this Guidance Note are based on specifications, procedures and other information that have been collected from the FEM from its members. They represent what is, as far as FEM is aware, the best available data at the time of publication on the instruction and use of the equipment concerned in the general conditions described and are intended to provide guidance for such use.

The suitability of this Guidance Note must be determined by the judgement of the person applying it in accordance with the conditions in which use is envisaged and subject to all relevant statutory requirements.

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