



**MINISTÈRE
DU TRAVAIL
ET DES SOLIDARITÉS**

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**MINISTÈRE
DE L'AGRICULTURE,
DE L'AGRO-ALIMENTAIRE
ET DE LA SOUVERAINETÉ
ALIMENTAIRE**

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ISO 12100 REVISION

***EVOLUTION,* AND CONFLICT WITH REGULATION**

Status of the Draft International Standard (DIS) Inquiries

Repeated Failures: The revision process of ISO 12100 has faced significant opposition through two Drafts International Standard (DIS) stages:

- **DIS 1:** Received negative votes at the **CEN** level.
- **DIS 2:** Received negative votes at both **ISO** and **CEN** levels.

Current Status: A 3rd DIS inquiry is now scheduled.

Two major points remain unresolved in the draft standard:

Issue concerning the protection of Moving Transmission Parts

The figure guiding the implementation of protective devices for moving transmission parts has been removed but a point remains unclear in the clause.

The proposed replacement text contains elements that do not comply with the requirement regarding the protection of transmission elements:

The text mentions that :

- *Contact with power transmission hazards shall be prevented by fixed guards.*
- *Where fixed guards are not practical, interlocking guards shall be applied.*
- *Where [these] are not practical, **protective devices shall be applied.***
- *Where none of the above is practical, **other safeguarding methods shall be provided.***

Requirement 1.3.8.1 provides only two options for the moving protection parts: either fix guards or interlocking movable guards.

Guide to application on the machinery directive mentions that *If frequent access is required, interlocking movable guards should be fitted.*

Issue concerning the concept of Tolerable Risk

The concept of tolerable risk has been introduced in the definitions.

Clause 3.19

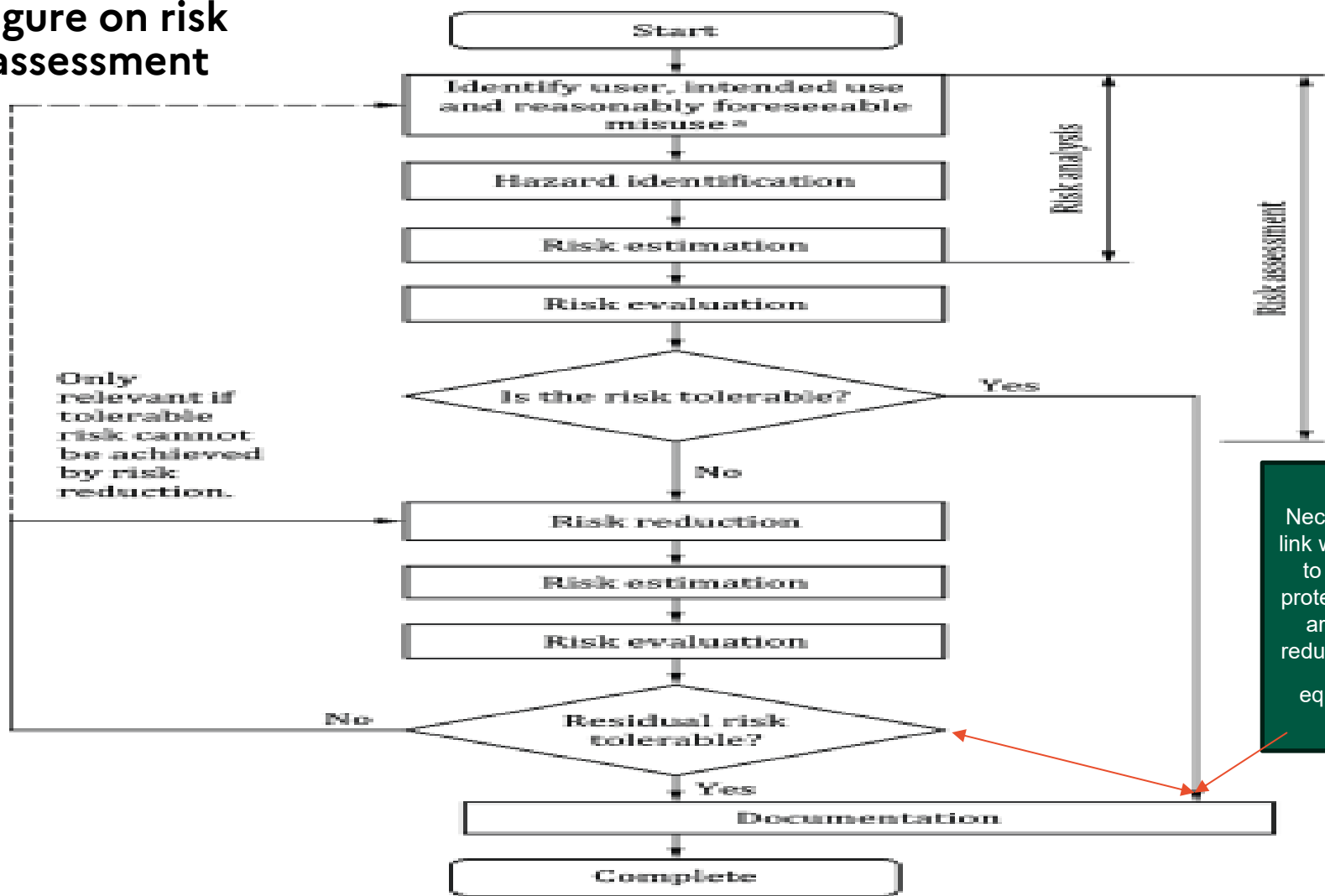
tolerable risk (acceptable risk, adequately reduced risk)

level of risk that is accepted in a given context based on the current values of society at a minimum in accordance with legal requirements.

This definition seems to indicate that the acceptable level of risk must comply with applicable regulations. In Europe, this would refer to the requirements set out by the Machinery Regulation.

But in the risk assessment figure, it is observed that tolerable risk allows for bypassing the risk reduction process provided in the general principles of prevention of the Machinery Regulation (EHSR 1.1.2).

Figure on risk assessment



Necessary to add a link with residual risk to show that the protective measures are sufficient to reduce the risk to an equivalent level.

Only relevant if tolerable risk cannot be achieved by risk reduction.

Conclusion

If the figure is not removed, it must be modified to establish a clear link between the tolerable risk and the residual risk.

Without a correlation between the two concepts, the definition of tolerable risk remains too vague and subjective to be acceptable at the European level;

manufacturers may interpret this diagram as an opportunity to design machinery that accept risks that could have been reduced.

If this new DIS does not make progress on these two issues, France will vote negatively again.