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EU Machinery Regulation 2023/1230: readiness checklist for robot cells

Asset Online Pvt Ltd (AOPL) · aopl.tech · October 2026 · status as of 26 Oct 2026

Regulation (EU) 2023/1230 replaces Directive 2006/42/EC on **20 January 2027**. No postponement has been adopted. Tick each item, name an owner and keep this sheet with the technical file. Article references are to Regulation (EU) 2023/1230 unless stated. This is a working checklist, not legal advice.

1. Scope and dates

	Check	Reference	Owner
☐	List every machine or robot cell you will place on the EU or Northern Ireland market on or after 20 Jan 2027.	Art 54, corrigendum	
☐	Confirm which units ship before 20 Jan 2027 under Directive 2006/42/EC (they may still be sold later).	Art 52(1)	
☐	Decide who is the manufacturer of each cell: integrator, or the plant building for its own use.	Art 3(18)	
☐	Check that robots and sub-assemblies come with a declaration of incorporation under the Regulation.	Art 11, Annex V Part B	

2. Conformity route

	Check	Reference	Owner
☐	Screen each cell for Annex I Part A items, incl. ML safety components with self-evolving behaviour.	Annex I Part A, Art 25(2)	
☐	For Part B items (person-detecting devices, safety logic units, presses), check full harmonised standard coverage.	Annex I Part B, Art 25(3)	
☐	Book a notified body early if any Part A item, or a Part B item without full coverage, applies.	Art 25	
☐	Track the first harmonised standards list under the Regulation and any restrictions.	Art 20	

3. Essential requirements (Annex III)

	Check	Reference	Owner
☐	Redo the risk assessment, including foreseeable evolution of self-learning behaviour and machine interactions.	Annex III, General principles	
☐	Protection against corruption: protect safety-critical hardware, software and data; log interventions.	Annex III 1.1.9	
☐	Control systems withstand foreseeable malicious attempts; 5-year log of interventions and safety software versions.	Annex III 1.2.1(a), (f)	
☐	Self-evolving systems: stay within defined task and movement space; keep safety decision data 1 year.	Annex III 1.2.1	
☐	Human-machine coexistence and interaction, including psychological stress, addressed in the design.	Annex III 1.3.7, 1.1.6	

4. Documents and instructions

	Check	Reference	Owner
☐	Technical file in Annex IV Part A format, incl. point (n) for sensor-fed or autonomous cells.	Annex IV Part A	_____
☐	Safety software source code or programming logic available on reasoned request; keep files 10 years.	Art 10(3)	_____
☐	Digital instructions: access marked on the machine, printable and downloadable, online at least 10 years.	Art 10(7)	_____
☐	Process to send paper instructions free within one month when a buyer asks at purchase.	Art 10(7)	_____
☐	EU declaration of conformity, on paper or via web address or code kept online 10 years.	Art 10(8), Art 21	_____
☐	Nameplate: model, year of construction, serial no., maker's postal and digital contact, space for importer.	Art 10(5), (6), 13(3)	_____

5. Supply chain and changes after sale

	Check	Reference	Owner
☐	Importers and distributors briefed on their checks; own-brand resale makes them the manufacturer.	Art 13, 15, 17	_____
☐	Keep records of who supplied you and whom you supplied for 10 years.	Art 19	_____
☐	Written procedure to screen every change against the substantial modification test before work starts.	Art 3(16), Art 18	_____
☐	Agree in the contract who signs as manufacturer if a change is substantial.	Art 18	_____
☐	Watch the AI delegated acts for machinery, due to apply by 2 Aug 2028.	Art 8 (as amended by Reg 2026/1744)	_____

Substantial modification: quick test (Art 3(16))

A change is substantial only if all three apply: (1) not foreseen or planned by the manufacturer; (2) it creates a new hazard or increases an existing risk; (3) it needs new guards or protective devices that require changes to the safety control system, or extra measures for stability or mechanical strength. If yes, whoever makes it becomes the manufacturer of the affected machinery (Art 18).

Sources: Regulation (EU) 2023/1230, OJ L 165, 29.6.2023, corrected by OJ L 169, 4.7.2023; Regulation (EU) 2026/1744 (Digital Omnibus on AI), OJ L 24.7.2026. Full explainer: aopl.tech/blog. Asset Online Pvt Ltd (AOPL) supplies and integrates solutions in this area. Contact: aopl.tech/contact-us