

CE Marking

Convex mirrors (or mirrors in general) do not come under the Machinery Directive and so do not require CE marking. In particular they do not meet the definition of a machine (no moving parts etc) and also do not meet the definition of Safety Component".

The latter is defined in the Supply of Machinery (Safety) Regulations 1992 as amended, in Reg 2 as "Safety Component" means a component, provided that is not interchangeable equipment which is supplied separately to fulfil a safety function when in use and the failure or malfunctioning of which endangers the safety or health of exposed persons".

The reason for my opinion is that although most of the definition does fit, the failure or malfunctioning referred to here does not refer to operator error or poor adjustment (these are outside the control of the manufacturer) but a failure in the mirror itself. But a breakage would not directly endanger persons - if the operator continued to drive with a broken mirror a risk would be created, but again this is a user issue. The meaning of this requirement is to cover items such as safety valves; and light guards where a malfunction would put operators at direct risk.

