

The engine company.



DEUTZ AG · 51057 Köln / Cologne · Deutschland / Germany

To whom it may concern  
European Commission  
Pack27 consultation

(via EUROMOT) |

DEUTZ AG

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## Request Extension of RoHS Annex III Exemption 6a, 6b, 6c, 7a, 7c, 42, 44

Dear Sir or Madam,

DEUTZ AG, a publicly traded company headquartered in Cologne, Germany, is one of the world's leading manufacturers of innovative drive systems. Its core competencies are the development, production, distribution, and servicing of drive solutions in the power range up to 620 kW for off-highway applications. The current portfolio extends from diesel, gas, and hydrogen engines to hybrid and all-electric drives. DEUTZ drives are used in a wide range of applications including construction equipment, agricultural machinery, material handling equipment such as forklift trucks and lifting platforms, commercial vehicles, rail vehicles, and boats used for private or commercial purposes.

We understand that the European Commission is currently considering an application to extend an existing exemption under Annex III of the European Union's Directive on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment:

- Exemption 6b-I Annex III, Lead as an alloying element in aluminium containing up to 0,4 % lead by weight, provided it stems from lead-bearing aluminium scrap recycling. (5 years)
- Exemption 6b and 6b-II Annex III, Lead as an alloying element in aluminium for machining purposes with a lead content up to 0.4% by weight. (5 years)
- Exemption 6a Annex III, Lead as an alloying element in steel for machining purposes containing up to 0.35%. (5 years)

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- Exemption 42 Annex III: Lead in bearings and bushes of diesel or gaseous fuel powered internal combustion engines applied in non-road professional use equipment:
  - with engine total displacement  $\geq$  15 litres,
  - or with engine total displacement  $<$  15 litres and the engine is designed to operate in applications where the time between signal to start and full load is required to be less than 10 seconds,
  - or regular maintenance is typically performed in a harsh and dirty outdoor environment, such as mining, construction, and agriculture applications. (5 years)
- Exemption 44 Annex III, Lead in solder of engine control units of combustion engines, installed in equipment used at fixed positions while in operation which is designed for professionals, but also used by non-professional users. (until January 2027).
- Exemption 7a Annex III, Lead in high melting temperature type solders (i.e. lead-based alloys containing 85 % by weight or more of lead) used in engines, engine components and ancillary components and in end-products in which they are used. (5 years)
- Exemption 7(c)-I Annex III, Electrical and electronic components containing lead in a glass or ceramic other than dielectric ceramic in capacitors, e.g. piezo-electronic devices, or in a glass or ceramic matrix compound used in engines, engine components and ancillary components and in end-products. (5 years)

This application, filed by EUROMOT, would seek to extend that exemption for an additional five years.

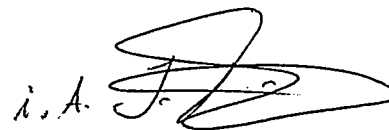
We urge you to give full consideration of this application and to extend this exemption for a full five years. This continued exemption is critical for European manufacturers and to support businesses and consumers and to continue to improve the reliability and sustainability of their products.

Thank you for the opportunity to provide our views on this exemption request and I welcome any follow-up questions you may have.

Yours Sincerely,



Uwe Giessler  
Head of standardization in R&D



Irmela Friedrich  
Snr Manager Sustainability & Compliance  
in Procurement