

## Position Paper

[PP-PA-002-12-2023]

Paris, 05 December, 2023

### Request Extension of RoHS Annex III Exemptions: 6a, 6b-I, 6b-II & 7a

Dear Sir/Madam,

EUROPGEN comprises of National Associations as well as direct company members representing approximately 75 generating set manufacturers around Europe.

We understand that the European Commission is currently considering an application to extend existing exemptions 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 6a Annex III, Lead as an alloying element in steel for machining purposes containing up to 0.35%. (5 years)
- 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 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)

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

On behalf of EUROPGEN, I 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.

Sincerely,  
Jean-Michel GEILLER  
EUROPGEN General Secretary