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**Subject: Request Extension of RoHS Annex III Exemptions 6a, 6b, 7a, 7c, 42, 44**

Dear Sir/Madam

Volvo Group manufactures trucks, buses, construction equipment, and power solutions for industrial and marine applications. Volvo Penta is the part of Volvo Group that manufactures engines and drivelines for off highway applications and power generation, as well as propulsion solutions, drivelines, user interfaces and support for marine applications.

We understand that the European Commission is currently considering applications 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.

These applications, filed by EUROMOT, would seek to extend those exemptions for an additional five years:

- Exemption 6a Annex III: Lead as an alloying element in steel for machining purposes containing up to 0.35%.
- 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.
- 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.
- 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.
- 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.
- 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.

- 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.

On behalf of Volvo Penta, I urge you to give full consideration of this application and to extend these exemptions for a full five years. These continued exemptions are 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,



**Elin Kajsajuntti**  
Regulatory Affairs Manager