

Ken Monahan
Vice President, International Economic Affairs

Jan. 20, 2023

Mr. Hendrik Engelkamp
RoHS Policy Officer, Waste Management and Recycling
Unit A2 - Waste Management and Recycling
Directorate-General for Environment
European Commission
BU-9 05/106
Avenue de Beaulieu
B-1160 Brussels
Belgium

Re: Request Extension of RoHS Annex III Exemption 44: Lead in Solder of Engine Control Units of Combustion Engines, Installed on Equipment Used at Fixed Positions While in Operation Which Is Designed for Professionals, but Also Used by Non-Professional Users

Dear Mr. Engelkamp:

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 44 for lead in solder of engine control units of combustion engines, installed on equipment used at fixed positions while in operation which is designed for professionals, but also used by non-professional users. This application, filed earlier today by EUROMOT, would seek to extend that exemption until January 2027.

On behalf of the National Association of Manufacturers (NAM), the largest manufacturing association in the U.S. representing small and large manufacturers in every industrial sector that serve business and consumers in the U.S., Europe and around the world, I urge you to give full consideration of this application and to extend this exemption for the full requested duration. This continued exemption is critical for manufacturers from the United States working to support European businesses and consumers and to continue to improve the reliability and sustainability of their products.

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

Sincerely,



Ken Monahan