

The logo for EUROMOT, featuring the word "EUROMOT" in white, bold, uppercase letters on a dark green rectangular background.

The European Association of Internal
Combustion Engine Manufacturers

A logo celebrating 25 years from 1991 to 2016. It features a large "25" in a stylized font, with "YEARS" and "1991-2016" to its right. Below the "25" is the text "Promoting Engines in Society" in a smaller font.

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Feedback on the roadmap to evaluation of the RoHS Directive

EUROMOT welcomes the European Commission's initiative to consult stakeholders in the process of evaluating the RoHS Directive, and to particularly assess the following aspects of the Directive: its effectiveness, efficiency, relevance, coherence and EU added value.

EUROMOT would like to highlight a major shortcoming that our industry sector has experienced over the past few years, that has a negative impact on all of said aspects: the methodology for implementing exemptions.

Article 5 of RoHS provides for a comprehensive mechanism for granting exemptions to substance restrictions. Because our engines are utilized globally in a very broad array of applications, exemptions have been pursued either because no substitute for the RoHS substance exists, or because the reliability of the substitute cannot be assured without further research.

However, the process of evaluating exemption requests has often been considerably delayed, thus lacking efficiency and transparency towards stakeholders. Exemptions requests have been pending for periods ranged from 15 to more than 40 months.

Because EUROMOT membership employ global supply chains, planning must take place well in advance of regulatory transition dates to ensure compliant inventories are in place. As a consequence of the delays in the exemption request assessing process, leading to an unacceptable degree of legal uncertainty, engine manufacturers are already as of today missing orders at an increasing rate for particular cases.

For these reasons, we urge the European Commission to review the process of evaluating and granting exemptions, to make it considerably more transparent, efficient and predictable to stakeholders. In particular, defined deadlines and/or alternative transitional solutions are required to reduce unnecessary burden for the industry and to avoid jeopardizing the availability of products on the EU market.

EUROMOT would like to reiterate its willingness to contribute to the RoHS evaluation process.

President:
Georg Diderich

General Manager:
Dr Peter Scherm

ENGINE IN SOCIETY

A European Interest Representative (EU Transparency Register Id. No. 6284937371-73)

A Non-Governmental Organisation in observer status with the UN Economic Commission for Europe (UNECE) and the UN International Maritime Organisation (IMO)