

# EGMF position paper

## EGMF comments on the European Commission proposal to renew exemption 41 under the RoHS Directive (2011/65/EU)

28 August 2019

EGMF – the European Garden Machinery industry Federation – represents major garden, landscaping, forestry and turf equipment manufacturers. Through its 30 European corporate members and 7 National Associations, EGMF represents over 18 million units placed on the European market and EGMF members employ over 120,000 people in the EU.

EGMF welcomes the European Commission proposal to amend Annex III of Directive 2011/65/EU, the so-called RoHS 2 Directive, to renew the exemption 41.

Several types of garden, landscaping, forestry and turf maintenance machinery are impacted by the RoHS Directive. While the RoHS 2 requirements already apply to several types of EGMF equipment for several years, a substantial amount of combustion-engine powered equipment must also comply with this legislation since 22 July 2019.

Although the garden and outdoor power equipment industry is working on substitutes, alternatives providing the suitable level of quality, durability and safety are not yet available for all applications of lead.

EGMF is in favour of renewing RoHS exemption 41 allowing the use of lead in solders and termination finishes used in certain hand-held combustion engines.

Therefore, we fully support the draft Commission Delegated Directive renewing this exemption, especially for equipment falling in RoHS 2 categories 6 and 11.

For further information, please contact the EGMF Secretariat, [secretariat@egmf.org](mailto:secretariat@egmf.org)





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*The European Garden Machinery Industry Federation – EGMF – has been the voice of the garden machinery industry in Europe since 1977. With 30 European corporate members and 7 National Associations representing manufacturers of garden, landscaping, forestry and turf maintenance equipment, we are the most powerful network in this sector in Europe.*

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