

EUROMOT POSITION

COMMENTS ON DRAFT DELEGATED REGULATION ON POP & THE INCLUSION OF DECHLORANE PLUS

22 July 2024

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

EUROMOT welcomes the possibility to comment on the European Commission's proposal for a delegated regulation on POP for the inclusion of Dechlorane Plus.

In the current draft, the exemptions proposed are for:

- ***spare parts for any of the following:***
 - (i) land based motor vehicles;***
 - (ii) marine, garden and forestry machines;***

where dechlorane plus was initially used in their production, until the end of their service life or until 31 December 2043, whichever comes earlier.

EUROMOT welcomes the inclusion of ***(i) land based motor vehicles; and (ii) marine, garden and forestry machines.*** However, for us, it is not clear what is meant by ***(i) land based motor vehicles*** and whether this includes all Non Road Mobile Machinery (NRMM) and its applications. Could the European Commission please clarify what is meant by ***(i) land based motor vehicles?***

In addition to (i) & (ii), we would like to add some extra wording as highlighted in red below to ensure that all EUROMOT non road applications (including marine and rail applications) be also explicitly mentioned in the text.

Furthermore, EUROMOT requests that spare parts for stationary machines also be explicitly mentioned, as outlined in the Stockholm Convention¹ which already includes stationary applications.

EUROMOT proposal to amend the delegated regulation on POP for the inclusion of Dechlorane Plus - In Part A of Annex I: the exemptions are for:

- **2. (d) spare parts for any of the following:**
 - (i) land based motor vehicles,**
 - (ii) marine, garden and forestry machines;**
 - (iii) non road mobile machinery according to the definition art. 3 (1) of the Regulation (EU) 2016/1628;**
 - (iv) marine recreational craft as defined in Art.2.1.a of Regulation (EU) 2013/53**
 - (v) inland Waterway vessels as Art.3 (34) of Regulation (EU) 2016/1628;**
 - (VI) rail cars & locomotives as defined in Art. (41), (42) & (43) of Regulation (EU) 2016/1628;**
 - (VII) stationary machinery as defined in Art.3 (36) of Regulation (EU) 2016/1628;**
 - (VIII) stationary gen sets as defined in Art.3 (35) of Regulation (EU) 2016/1628;**

where dechlorane plus was initially used in their production, until the end of their service life or until 31 December 2043, whichever comes earlier.

Moreover, we believe that there should be a transition period of 18 months between the entry into force of the text and the application of the restriction, as it is normally done for REACH restrictions. As it's only been a short amount of time since this substance has been on the candidate list, companies don't have a lot of data on which parts contain this substance. Suppliers need more time to identify in which parts Dechlorane Plus can be identified, hence the need for a transition period.

To conclude, to avoid any misunderstanding, we propose to add clearer text to include all NRMM applications and stationary machinery under the scope of the exemption for spare parts and propose an 18 month transition period between the entry into force of the text and the application of the restriction.

EUROMOT – 2024-07-22

For more information please contact:

EUROMOT aisbl - European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers
Rue Joseph Stevens 7, 1000 Brussels, Belgium
Aliénor Poher – Senior Manager Regulatory Affairs and Sustainability
Phone: +32 (0) 28 93 21 42
Email: alienor.poher@euromot.eu
www.euromot.eu
TVA BE 0599.830.578
RPM Brussels
EU Transparency Register ID number: 6284937371-73

¹ UN (2023) Stockholm convention, The new POPs under the Stockholm Convention. Dechlorane Plus. SC-11/10. Available at : <https://www.pops.int/TheConvention/ThePOPs/TheNewPOPs/tabid/2511/Default.aspx>



EUROMOT aisbl

A European Interest Representative · TVA BE 0599.830.578 · RPM Brussels
EU Transparency Register Id. No. 6284937371-73

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

PRESIDENT

Dr Holger Lochmann

GENERAL MANAGER

Dr Peter Scherm

THIS IS EUROMOT

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

Founded in 1991, we provide an unparalleled heritage and hub of expertise for businesses, authorities, regulators, and public stakeholders worldwide. In partnership with major sector associations and institutions, it is our mission to drive smart regulation and sustainable innovation.

Delivering dependable power for society at high energy conversion efficiency with low emissions remains a key objective of EUROMOT member companies. EUROMOT asserts internal combustion engines and alternative powertrains are a key enabler to address the additional societal need for decarbonisation across multiple industry sectors. This can be achieved by continuing to advance the development of highly efficient energy conversion systems capable of operating on low and net-zero Greenhouse Gas (GHG) energy carriers.

Headquartered in Brussels, EUROMOT is a European interest group, and our profile is registered in the EU Transparency Register under the identification number 6284937371-73. We have been granted consultative status at the United Nations IMO (International Maritime Organization, London) and United Nations ECE (Economic Commission for Europe - Geneva) and other relevant stakeholders.

OUR MEMBERS



www.euromot.eu



EUROMOT aisbl

A European Interest Representative · TVA BE 0599.830.578 · RPM Brussels
EU Transparency Register Id. No. 6284937371-73

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

PRESIDENT

Dr Holger Lochmann

GENERAL MANAGER

Dr Peter Scherm