

24 May 2012

TO WHOM IT MAY CONCERN**Subject: CE Marking**

With reference the introduction of CE marking from European Union Directive we would offer following comments.

First of all we would draw your attention to the fact that at the moment no European Directive cover lead acid batteries for CE marking. Here attached please find a document that comes from CENELEC report on the application of CE marking of secondary cells or batteries where it is stated that is not necessary to put the CE marking on the batteries. Furthermore, we would offer you some more comments relating to different European Union Directives which in some cases should be applicable to the system where the batteries are installed:

- **EMC-EEC Directive 89/336 - 92/31 - 93/68**

There is a draft EN 50226:1995 prepared by the Technical Committee CENELEC TC21.X with the following test: "Rechargeable cells or batteries are not sensitive to normal electromagnetic disturbances and therefore no immunity test shall be required. Free-standing (rechargeable cells or batteries electrically isolated from any associated electrical system are for all practical purpose electromagnetically inert and therefore the requirements for electromagnetic compatibility shall be deemed to be satisfied".

- **LVD - 73/23 EEC - 93/68**

The directive above mentioned is applicable to electrical equipment designed for use with a voltage rating between 50 and 1000 V for alternating current and between 75 and 1500 V for direct current. The FIAMM batteries have a nominal voltage between 2 and 12 Vcc.

- **Equipment Safety 89/392 EEC**

The above directive affects the safety of a machine with moving parts. FIAMM lead-acid stationary batteries do not include moving parts.

It should be noted that rechargeable cells or batteries are part of an electrical system and the manner in which they are used could invoke one or more requirements of the above directives upon that systems. In such cases, the above requirements shall be accommodated by the design of the system.

If you require any clarification please feel free to contact us

Best regards,

Luciano Gentilin

Fabbrica Italiana Accumulatori
Motocari Montecchio - FIAMM S.p.A.
Viale Europa, 63 MONTECCHIO MAGGIORE (VI)
P. IVA 02870970247

F.I.A.M.M. S.p.A.
Codice fiscale Partita IVA Registro Imprese 02870970247
Capitale sociale 50.000.000,00 Euro - R.E.A. 281353