



Dear Customer

I thought it may be a good thing to put in writing a short explanation of what EU3a compliance is all about, SDMO appear to be shouting about it so what does it really mean ?

On the 1st January 2007 the NRMM regulation came into force and became UK law, NRMM stands for 'Non Road Mobile Machinery', all generator manufactures producing mobile generators were required by law to comply to this regulation for gensets in the following table

NO_x / HC / CO / PM (g/kW-hr)
(NO_x + HC) / CO / PM (g/kW-hr)

The brackets indicate a combination of nitrogen oxide and hydrocarbons

Gross Capacity Generating sets	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
<18 kW											
18-37 kW				8.0 / 1.5 / 5.5 / 0.8				(7.5) / 5.5 / 0.8			
37-56 kW				7.0 / 1.3 / 5.0 / 0.4				(4.7) / 5.0 / 0.4			
56-75 kW				7.0 / 1.3 / 5.0 / 0.4				(4.7) / 5.0 / 0.4			
75-130 kW				6.0 / 1.0 / 5.0 / 0.3				(0.4) / 5.0 / 0.3			
130-560 kW				6.0 / 1.0 / 3.5 / 0.2				(4.0) / 3.5 / 0.2			
>560 kW											

Phase (Stage) II Phase (Stage) IIIA

NO_x (nitrogen oxide): Generic term including several gases comprising nitrogen and oxygen which react during combustion.
 HC (hydrocarbons): Reacts with nitrogen oxide in sunlight to form ozone that forms the basis of smog and acid rain.
 CO (Carbon monoxide): Produced by the incomplete combustion of fossil fuels.
 PM (Particulate matter): Non gaseous particles comprising soot, carbon and other combustibles.

4 years later on the 1st January 2011 the regulation required that all manufactures supplying EU countries must produce mobile product to stage 3a regulation, the powers that apply in 2011 are shown in the above table in the blue section.

Flexibility

The regulation allowed for some restricted flexibility, 2 options are available both meant options allowed manufactures to produce a limited amount of generators for the mobile markets providing they used **2010** produced engines.

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Option 1 the manufacturer must not exceed 20% of their average stage 2 output calculated on the past 5 years production specifically for EU mobile application, so say I produced 1000 stage 2 generators over 5 years, my average would be 200 generators and 20% leaves me with the availability to produce 40 gensets to stage 2.

Option 2

- 1.3. As an optional alternative to section 1.2, the OEM may seek permission for his/her engine suppliers to place on the market a fixed number of engines under the flexibility scheme. The number of engines in each engine category shall not exceed the following values:

Engine category	Number of engines
19-37kW	200
37-75kW	150
75-150kW	100
150-560kW	50

In any case the engine must be produced 2010

If a manufacturer produces stage 2 generators in 2011 for the mobile market then he must also provide a data label on the set that states the generators position within an authorised flexibility programme, if there is no data label to this effect then the generator may be deemed non-compliant.

What is the difference between Mobile and Stationary?

SDMO identifies that the following generators must be stage 3a compliant and mobile:

- Generators between 20-500 kVA with outlet sockets
- Generators designed specifically for the hire markets with or without sockets
- Any generator supplied with a trailer
- Any generator knowingly supplied that will not be a permanent installation.

SDMO's Flexibility

SDMO has used up all of its available flexibility up to 200 kVA, as of today's date only 30 2010 engines remain available for stage 2 production and restricted to the power range 350 -500 kVA .

Validity

This document has been checked and is believed to be correct, further information can be found on the DFT/VCA website

<http://www.dft.gov.uk/vca/enforcement/non-road-mobile-mach.asp>

From the DFT/VCA website

Penalties for manufacturers selling non-compliant NRMM

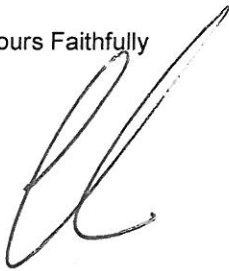
VCA is the UK nominated enforcement body and can enter premises and inspect equipment without notice to verify compliance. It can also impound equipment where necessary.

In the UK, there is a maximum penalty of £5,000 if you supply NRMM fitted with an engine that has not been type approved.

Breaking the regulations is also an offence under the Consumer Protection Act 1987. This means you could face three months' imprisonment and an unlimited fine. You could also be forced to recall and replace the products you have sold.

I trust this information has been useful and shows that SDMO is committed to providing you with product that meets or exceeds current legislation requirements

Yours Faithfully

A handwritten signature in black ink, appearing to be 'Clive Dix', written over the typed name.

Clive Dix
Director

SDMO Energy Ltd, Portable Power and Rental Division