

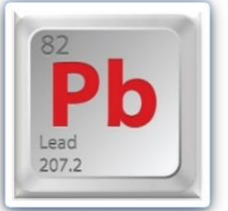
Lead (Pb) in REACH and RoHS

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Hans Weissenböck

ARGE General Secretary

Content



- ➔ REACH and RoHS under revision
- ➔ REACH
 - ➔ Derogation for lead in “keys and locks, including padlocks” (Restriction)
 - ➔ Lead being proposed to become subject to Authorisation
- ➔ RoHS Exemptions for lead in steel, aluminium and copper alloys
- ➔ Take away ...



Pro memoria (REACH)

- ⇒ Lead (Pb) is (a) a **restricted substance**, and (b) a **Substance of Very High Concern (SVHC)**
- ⇒ Lead (Pb) in '**keys and locks, including padlocks**' **explicitly allowed in** Annex XVII Entry 63
 - ⇒ after a review by the European Chemicals Agency (ECHA) in 2019/2020 the indispensability of lead was confirmed; expectedly, it will be reviewed in some years again
 - ⇒ EU law makers expect progress in reducing the lead content – better elimination of lead





Pro memoria (RoHS)

- ➔ **Lead (Pb)** in **copper alloys up to 4%** in **'electric and electronic equipment'** **explicitly allowed** under **RoHS** Annex III Exemption 6(c); also limits for **lead in steel and aluminium alloys** exist
 - ⇒ for electronic/ mechatronic building hardware exemption will **expire July 2024**
 - ⇒ **RoHS Industry Umbrella Project (UP)**, supported by ARGE as a partner organisation of UP, filed a request for extension of exemption in January 2020



REACH and RoHS under revision



- ➔ **European Commission** will publish its **proposal for the revision of REACH end-2023** (originally planned for end-2022); revision will be substantial (i.a. faster processes, tighter legal control, Essential Use concept)
- ➔ **A revision of RoHS will/ might follow**, objectives are to improve it and to further align it with REACH

Question on REACH:

Will there be any impact on manufacturers of locks and building hardware with lead (Pb) having been proposed to become subject to Authorisation?

- ➡ **No direct impact in general, as ‘articles’ are outside of the Authorisation regime (all semis procured are ‘articles’)**
- ➡ **”Practically, nothing is happening with the dossier. I do not expect it to be included in Annex XIV in the foreseeable future. The EC does not have the resources to process such a large number of registration dossiers ...”**

Dr Marko Sušnik, Austrian Economic Chambers

Question on RoHS:

The exemption for lead (Pb) in steel, aluminium alloys and in copper alloys will expire in July 2024. What is the status?

- ➡ RoHS “Pack 22 Report” was published by the European Commission in February 2022. It recommended to extend the exemption until July 2026.
- ➡ Due to a new request filed by the industry afterwards, the publication of the respected Delegated Act will be delayed. Hence, the date of July 2026 might not be feasible anymore.
- ➡ ARGE, together with the RoHS Industry Umbrella Project will file a new request for extension of the exemption

Take away from these slides ...

- ➔ **ARGE is in contact with EU legislators, and concerning RoHS co-operates tightly with the RoHS Industry Umbrella Project**
- ➔ **ARGE is happy to provide information to its members as far as this lies within its competence**



Thank you!

Any more questions?