

# EU REACH Regulation and RoHS Directive

Changes ahead for our industry concerning lead (Pb)

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# General thresholds for lead in REACH and in RoHS

**REACH:** generally, **up to 0.1% w/w**

*Article 33*

## **Duty to communicate information on substances in articles**

1. Any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration **above 0,1 % weight by weight (w/w)** shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.

**RoHS:** generally, **up to 0.1% w/w**

*ANNEX II*

**Restricted substances referred to in Article 4(1) and maximum concentration values tolerated by weight in homogeneous materials**

**Lead (0,1 %)**

**For certain products either lower or higher thresholds are defined – and also exceptions granted.**

**Certain exceptions allow also a higher lead content.**

## Actual situation with lead in REACH



- ➔ **Keys and small padlocks, which can be put into the mouth by a child:**
  - ⇒ Maximum lead content would need to be  $> 0.05\%$  but can be higher if the rate of lead release is not more than  $0.05\mu\text{g}/\text{cm}^2$  per hour
  - ⇒ But **'keys and locks, including padlocks' enjoy an exception** and are not subject to these limits; there is no expiry date for this exceptions
- ➔ **For other building hardware products, no specific provisions exist**

## Outlook concerning lead in REACH



- ➔ **No changes expected that would have an immediate and materially negative impact** on locks and building hardware in the coming years
- ➔ **Certain obligations** (e.g. information obligation, SCIP Database, EPD) **remain, respectively will increase**
- ➔ **In any way, society will have an increased awareness on lead in products**, leading to further regulatory pressure and awareness also at economic operators

## Actual situation with lead in RoHS



- ➔ All electric and electronic locks and building hardware products with a lead content above 0,1% enjoy the following exceptions:
  - ⇒ Lead in copper alloys: up to 4%
  - ⇒ Lead in steel: up to 0.35% (up to 0.2% in batch hot dip galvanised steel)
  - ⇒ Lead in aluminium alloys: up to 0.4%
- ➔ Currently, no expiry dates exist, as renewals of the extensions have been applied for; decision expected in H2/2025

## Outlook concerning lead in RoHS



### ➔ Lead in copper alloys:

➔ Exception will remain for many years more, at least for keys, lock cylinders and padlocks, but will depend also on the outcome of ARGE's research projects

➔ **Lead in steel:** Exception will remain for at least some years more

➔ **Lead in aluminium alloys:** Exception will expire in some years

# ARGE's advice



## ➔ For lock cylinders, padlocks and keys:

⇒ Participate in the **ARGE research projects** – or at least wait for the outcome and implement the results

## ➔ For all other locks and building hardware products

⇒ **Eliminate lead in all components wherever it is feasible**; after you have achieved this, life with regulators and customers will be easier



# Thank you!

## Any questions?