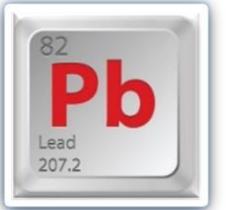


EU REACH Regulation and RoHS Directive

Changes ahead for our industry concerning lead (Pb)

Hans Weissenböck

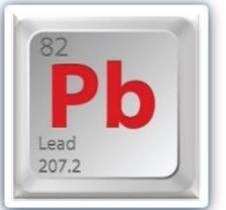
ARGE General Secretary



Content

- ➔ General thresholds for lead in REACH and in RoHS
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General thresholds for lead in REACH and in RoHS



REACH: generally, up to 0.1% w/w

RoHS: 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.

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



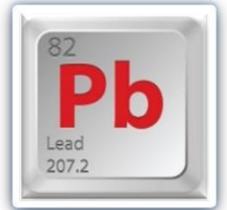
➔ Lead in copper alloys:

➔ 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?