

EU RoHS Directive:

New expiry dates for exemptions for lead in steel, aluminium alloys and copper alloys (e.g. brass and nickel silver)

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ANNEX

ANNEX

to

Commission Delegated Directive

amending Directive 2011/65/EU of the European Parliament and of the Council as regards an exemption for lead as an alloying element in steel, aluminium and copper

Steel

‘6(a)	Lead as an alloying element in steel for machining purposes and in galvanised steel containing up to 0,35 % lead by weight	Expires on [PO: 12 months after entry into force of the Delegated Directive].
6(a)-I	Lead as an alloying element in steel for machining purposes containing up to 0,35% lead by weight*	Expires on 30 June 2027 for all categories.
6(a)-II	Lead as an alloying element in batch hot-dip galvanised steel components containing up to 0,2% lead by weight*	Expires on 30 June 2027 for all categories.

Aluminium alloys

6(b)	Lead as an alloying element in aluminium containing up to 0,4% lead by weight	Expires on [PO: 18 months after entry into force of the Delegated Directive].
6(b)-I	Lead as an alloying element in aluminium containing up to 0,4% lead by weight, provided it stems from lead-bearing aluminium scrap recycling*	Expires on [PO: 12 months after the entry into force of the Delegated Directive] for categories 1-7, 10. Expires on 30 June 2027 for categories 9 industrial monitoring and control instruments, and 11.
6(b)-II	Lead as an alloying element in aluminium for machining purposes with a lead content up to 0,4% by weight*	Expires on [PO: 18 months after the entry into force of the Delegated Directive] for categories 1-7, 10. Expires on 30 June 2027 for categories 9 industrial monitoring and control instruments and 11.*
6(b)-III	Lead as an alloying element in aluminium casting alloys containing up to 0,3% lead by weight provided it stems from lead-bearing aluminium scrap recycling*	Expires on 30 June 2027 for categories 1-8, 9 other than industrial monitoring and control instruments, and 10.

Copper alloys (e.g. brass, nickel silver)

6(c)	Copper alloy containing up to 4% lead by weight*	Expires on 30 June 2027.'
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‘* The exemption shall not cover EEE for supply to the general public where the EEE or accessible part thereof may, during normal or foreseeable conditions of use, be placed in the mouth by children. However, the exemption shall apply where the following can be both demonstrated:

the rate of lead release from such an EEE or any accessible part, whether coated or uncoated, does not exceed 0,05 µg/cm² per hour (equivalent to 0,05 µg/g/h),

for coated articles, that the coating is sufficient to ensure that this release rate is not exceeded for a period of at least two years of normal or reasonably foreseeable conditions of use of the EEE.

For the purpose of this footnote, it is considered that an EEE or accessible part of an EEE may be placed in the mouth by children if it is smaller than 5 cm in one dimension or has a detachable or protruding part of that size.’

Take away from this presentation ...



- ➔ ARGE will endorse the **applications by the RoHS Industry Umbrella Project** (in which ARGE is a member) for renewal of the exemptions for **lead in steel (6a series)** and **lead in copper alloys (6c)**. In addition, **ARGE will make an own application for the renewal of the exemption of lead in copper alloys (6c)**, specifically in respect of **electronic keys, lock cylinders and padlocks**. Applications need to be made still in 2025.
- ➔ **After applications have been received and accepted by the European Commission**, the respective **expiry dates (for copper alloys: 30th June 2027)** are **lifted and are not valid anymore**.
- ➔ The **renewal of the exemption for lead in aluminium (6b series)** will be requested by the one or the other company concerned, but **without being endorsed by ARGE**.

Thank you!

Any questions and/or comments?