**What is RoHS?**

RoHS stands for the Restriction of Hazardous Substances. The original RoHS 1 was implemented in the European Union in 2003 under directive 2002/95/EC. The regulation restricts the use of hazardous substances within electrical and electronic equipment to protect the environment and public health. Under RoHS, ten substances are limited: lead, cadmium, mercury, hexavalent chromium, polybrominated biphenyls (PBB), and polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP), and diisobutyl phthalate (DiBP).

**When did RoHS take effect?**

Unless specifically excluded, RoHS took effect on all electrical and electronic devices July 1, 2006.

**Which companies are affected by RoHS?**

All manufacturers, resellers, distributors, and assemblers that sell electrical or electronic equipment containing restricted materials in the EU must comply with the most recent RoHS.

**Are aluminum alloys that contain lead (Pb) affected by RoHS?**

Yes, there is a lead maximum of 0.1%, with two exceptions. Under exemptions 6(b)i and 6(b)ii respectively, aluminum alloys containing lead may include up to 0.4% lead by weight when it stems from lead-bearing aluminum scrap recycling or when lead-bearing aluminum is used for machining purposes. Exemptions must be reviewed at least every four years, with the goal of removing exemptions if technologically or scientifically possible for the industry. Applications for renewing an exemption must be made 18 months prior to its expiration, and the commission is to decide on that extension six months prior to its expiry date. In instances of rejection, the exemption will expire between 12 to 18 months from the date of the decision.

**What about RoHS II?**

Directive 2011/65/EU, also known as RoHS II, went into force on in January 2013, revising the former directive. As opposed to RoHS 1, which required the government to conduct exemption review processes themselves, RoHS 2 puts the burden of renewal on industry parties who wish to maintain the exemption through filing an application of renewal.

**What about RoHS III?**

On July 22, 2019, Directive 2015/863/EU, known as RoHS III, went into effect. Changes included extending exemptions for medical devices, monitoring, and control tools for two years, creating a new catch-all category of previously uncategorized electrical/electronic equipment, and adding four new restricted substances of phthalates used in plasticizers.

**What is the status of exemptions 6(b)i and 6(b)ii?**

Two exemption requests have been submitted for 6(b). European Aluminum requested that the threshold for alloyed lead in scrap aluminum be lowered from 0.4% to 0.3%, while the RoHS Umbrella Project requested that the current exemption be maintained. Both requests would extend the exemption timeline for casting alloys. EU consultant Oeko Institute recommended that the EA request be approved with a phase-in period, noting that the limit of 0.35% lead content in ISO 17615:2007 and ISO 3522:2007 has been the international standard since 2007. Oeko also recommended that RoHS match the language of the EU’s REACH regulation that removes exemptions from articles or parts that may be placed in the mouth of children.

**When will the Commission decide on the renewal application?**

These exemption renewals are currently being reviewed by the EU Commission, and a decision is expected by November 2022. If Oeko’s recommendations are accepted along that timeline, the general 0.4% limit on lead-bearing aluminum from recycled scrap would end near the end of 2023 with a continuance of the casting alloys exemption at a reduced level of 0.3% thereafter. The 0.4% exemption for machining purposes would end in mid-year 2024.

**Where can I find more information?**

The consultant’s full report on 6(b) and 6(b)ii is available [here](#).

For official EU Commission updates, visit this [link](#).

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