

Subject: General Information – Alloy 2011 RoHS 2 Status

The Aluminum Association and its members recognize there is concern and confusion within the user community with regard to the potential expiration of Pb content exemptions in aluminum alloys, specifically alloy 2011. The following fact sheet is meant to provide users an update to the known status as of July 2015 with respect to this subject:

Background:

The current RoHS regulation (EU Directive 2011/65/EU “Restriction of Hazardous Substances in Electrical and Electronic Equipment”) sets limits for a list of substances used in electronics products marketed in the EU. This includes limits on the constituents of alloys, with the totals for substances set by weight of homogenous constituents.

- 1) RoHS regulations restrict the retail sales of non-compliant consumer electric products. Compliance dates set by the regulation are for electronics brought to market in the EU at the date of compliance. Parts and constituents of those products must comply at that date. Materials previously procured and in the supply chain for that product are not relevant, and do not have procurement windows separate from the date of compliance for the marketed product.
- 2) Aluminum alloys are in compliance when a “homogenous constituent” of the product meets the percentage limit for the weight of the part or constituent.

Under the current RoHS regulation, many exemptions have been granted and renewed in a pro forma process for several years. The regulation limits Pb content to 0.1% by weight, but under a long standing exemption, that limit is 0.4% by weight for aluminum alloys.

- 3) Exemption 6b is an exemption allowing producers of electrical components to use aluminum with up to 0.4% Pb content by weight
- 4) The current RoHS exemption expires in July 2016, as is specified in Annex III of RoHS 2 restrictions. If the exemption is not extended, electrical component manufacturers will be required to revert to the RoHS 2 limits of Pb content of 0.1% by weight in aluminum alloys at that time
- 5) If the exemption were allowed to expire, it would affect the access to market for electronics products, and the impact to aluminum producers and fabricators would be upstream in the supply chain. For this reason, eventual regulatory developments are of concern to the industry, since supply chain acquisition for these products occurs far in advance of the provision to market of the final product.

Current Industry Actions and Timeline:

The 6b exemption for lead is one of many exemptions affected by a current comprehensive review of the RoHS regulation. Applications for exemption for many substances have been submitted, among them, an aluminum industry application to extend the current exemption of lead in aluminum alloys.

- 6) An application to extend the exemption was jointly filed in January 2015 by the European Aluminum Association, the Aluminum Association and other interested parties
 - a. The European Aluminum Association is taking the lead for the aluminum industry, and chairs the 6b work group

- 7) The EU has until no later than January 2016 to respond to the request for the extension of the exemption. The EU *may* reply sooner than the deadline at the end of January 2016.
- 8) If the EU renders a negative decision, the current exemption will expire in between 12 to 18 months after the date of the EC decision. **That is, in case of exemption rejection, the exemption 6b will not expire before the end of 2017.**
- 9) If the exemption is extended, the extension will likely be for another 5 years, i.e. until to 22 July 2021.

Additional Resources:

EAA- <http://www.european-aluminium.eu/>

RoHS- http://ec.europa.eu/environment/waste/rohs_eee/index_en.htm

Consortium- Application for Renewal of RoHS2 Exemptions Cross-Industry Project
Strategic Management Team (SMT)

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