What is RoHS?
RoHS stands for the Restriction of Hazardous Substances. The original RoHS, informally referred to as RoHS I, was implemented in the European Union in 2003 under EU Directive 2002/95/EC. It set limit values for lead, cadmium, and several other chemicals in specified types of electrical and electronic equipment, including a lead maximum of 0.1%.

When did RoHS take effect?
The RoHS restrictions became effective with electrical and electronic equipment put on the market on and after July 1, 2006.

Which companies are affected by RoHS?
Any business that sells electrical and electronic equipment to EU countries, including resellers, distributors and assemblers, that utilize materials restricted by RoHS.

Are copper alloys that contain lead affected by RoHS?
An exemption was granted for lead in copper and brass alloys allowing up to 4% lead by weight. Other exemptions were also included in RoHS I where no satisfactory alternatives were available. The directive required that exemptions be reviewed at least every four years with the aim of deleting the exemption if their elimination or substitution is technically or scientifically possible, provided that the negative environmental, health and/or consumer safety impacts caused by the substitution do not outweigh the benefits.

Current Status of RoHS II Exemption 6(c) for copper alloys
On May 18, 2018, Commission Delegated Directive 2018/741 was published in the Official Journal of the European Union which renewed Exemption 6(c) through July 21, 2021, and longer for several regulated product categories. The renewal details are summarized in the amendment to Annex III shown in the figure below, and the full directive can be viewed online at the following link: https://bit.ly/2wYk7sm.

The original rationale continues to support the requirement for Exemption 6(c) as shown in the directive excerpt below.

“Currently, alternatives to the use of copper alloys containing lead up to 4% by weight cannot be identified as scientifically or technically practicable. Therefore, a renewal of the exemption for the duration of 5 years after the former expiry date is justified…”

Thus, copper and brass alloys containing up to 4% lead by weight remain compliant under RoHS II.

Who can I contact for more information?
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