



Compliance & Risks



Webinar

# ***RoHS Exemption Roadmap:*** Navigating Exemption Renewals and Their Timelines

26th March, 2025



→ | [complianceandrisks.com](https://complianceandrisks.com)



Q&A  
Session

Slides &  
Webinar  
Recording



Request a  
Demo

# Webinar Platform Tips

# Meet the Team



**Maciek Hulme**  
Senior Regulatory  
Engineer, RINA



**Orlaith Morris**  
Content Marketing  
Manager, Compliance &  
Risks

# Mission Statement

**Ensure global companies have the tools & information to build safe, sustainable, products in a world full of change**

# Trusted by the World's Leading Brands

**SAMSUNG**

**Miele**

 **MOTOROLA**

**EPSON®**



 **Abbott**

**FUJITSU**

**BOSE**

**BELDEN**

**PHILIPS**

**logitech**

**XEROX®**

**Thermo**  
SCIENTIFIC

  
**PUMA**

**GARMIN™**



Compliance & Risks



100K<sup>+</sup>  
Regulations

195  
Countries

10<sup>+</sup>  
Industries

28  
Languages

30  
Global  
Network  
Partners

9.6k  
Expert  
Queries  
answered



WHAT WE DO

# Unlocking Market Access

Keep on top of regulatory changes and their impact worldwide. Early warning alerts, impact probability, productivity workflow tools and so much more.



# Agenda

## 01. Introduction

RINA overview

## 02. Introduction to RoHS

Exemptions

Renewal criteria and timelines

Consultant Packs

EU rolling action plan

## 03. European Commission RoHS exemption drafts

Exemption 6a/6b/6c

Exemption 7a

Exemption 6c

## 04. Looking ahead

## 05. UK RoHS update





Compliance & Risks

# RINA Overview



→ | [complianceandrisks.com](https://complianceandrisks.com)

# RINA Overview



## Energy & Mobility

Energy solutions from O&G to renewables, asset integrity, product compliance, taking care of ESG impacts.



## Marine

Certifications, technologies and innovative services to manage transport and pleasure vessels.



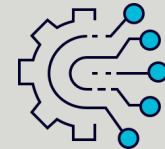
## Real Estate & Infrastructure

The path to the next generation of buildings and infrastructure by ensuring their safety and efficiency.

5,800 People  
220+ Offices  
70+ Countries  
>€797m Turnover

## Industry

Industry 4.0, R&D, innovation, advanced materials, full-scale testing, sustainability.



## Digitalisation

Solutions to support products, people and processes on their way to excellence.



## Inspection, Field & Legal

Vendor inspection, field activities and certification and compliance.



# Legislative Areas Covered



## Chemicals

- PFAS, RoHS, REACH, CLP, F-gas, ODS, POPs, California Proposition 65, Biocidal products, Food contact materials, Batteries, Packaging
- Restrictions, reporting requirements, SVHCs, Safety Data Sheets (SDS), Obsolescence, Testing



## Responsible Sourcing

- Conflict Minerals (3TGs)
- Supply Chain Due Diligence
- Ethical Mining



## Circular Economy

- Eco-design requirements and impacts and sustainability
- Disposal: WEEE, batteries, hazardous waste



## Technical, Performance and Product Conformity

- LVD, EMC, RED, ATEX, Machinery, Construction products etc. and global "equivalents"
- Facilitation of product testing
- AI Act and Cybersecurity regulations

# EU RoHS

## Basics and Exemptions



# RoHS Introduction

## Scope

**All equipment that relies on electricity or electromagnetic fields for at least one function**

- Unless excluded from scope
- Electrical function does not need to be the main function
- Equipment types are divided between 11 categories of products

**Restricts substances in homogeneous materials**

## Exemptions

**Allow for use of restricted substances in specified applications**

- Exemptions are temporary and expire unless renewed (valid for up to 5 or 7 years)
- Exemption application must be submitted 18 months prior to the exemption expiry date
- If an exemption renewal application is submitted, it benefits from continued validity until reviewed and published
- If the exemption is revoked or rejected, a transition of 12-18 months is granted

## Spares and repairs

- EEE can be “repaired as produced” – meaning that spare parts can continue to use exemptions that the equipment used when placed on the market.

# RoHS Exemptions

## Criteria for exemption renewal

Applications must demonstrate that:

- Elimination or substitution of the restricted substance is scientifically or technically impractical
- The reliability of substitutes is not ensured
- The negative impacts of substitution outweigh its benefits for the environment, health, and consumer safety.

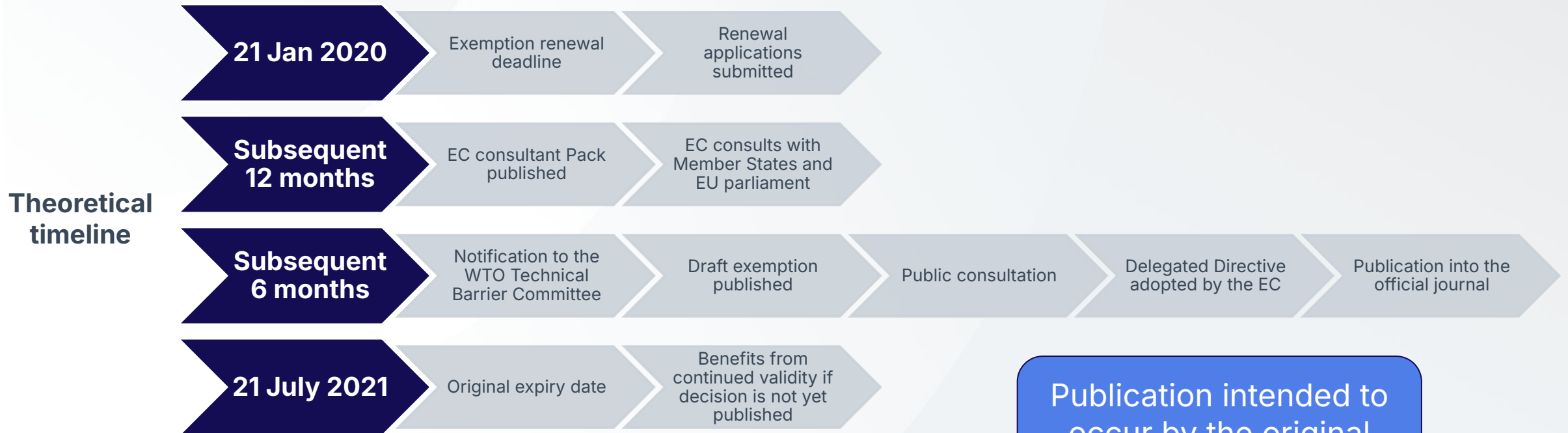
## EEE Categories

- A number of exemptions are category specific – can only be used if the EEE falls within that category
- Category 8 (Medical devices), 9 (monitoring and control instruments), 11 (all other EEE) may be granted longer exemptions – 7 years vs. 5 years for all other categories

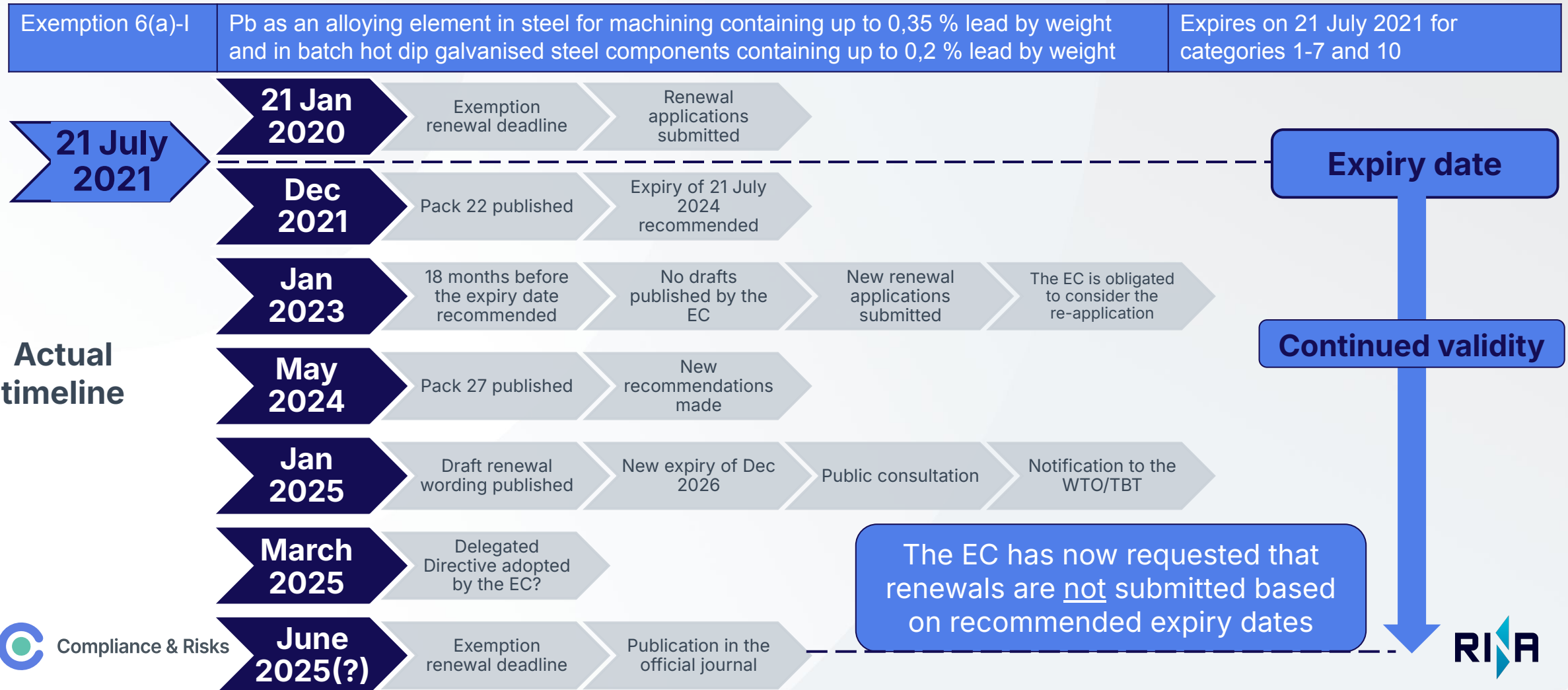
**The Directive seeks to reduce hazardous substances in EEE waste, driving the European Commission to reduce the number of exemptions or narrow their scope**

# Exemption 6(a)-I – Renewal Example

Exemption 6(a)-I	Pb as an alloying element in steel for machining containing up to 0,35 % lead by weight and in batch hot dip galvanised steel components containing up to 0,2 % lead by weight	Expires on 21 July 2021 for categories 1-7 and 10
------------------	--	---



# Exemption 6(a)-I – Renewal Example



# Current Packs Under Review

Oeko

## Pack 22:

**6a** Pb in steel  
**6a-I** Pb in steel for machining and hot dip galvanised steel  
**6b** Pb in Al  
**6b-I** Pb in Al from scrap  
**6b-II** Pb in Al for machining  
**6c** Pb in Cu  
**7a** Pb in high melting temperature solder  
**7c-I** Pb in glass or ceramic  
**7c-II** Pb in dielectric ceramic in capacitors etc.

## Pack 24:

**18(b)** Pb in lamps (suntanning)  
**18(b)-I** Pb in lamps (medical)  
**24** Pb solder multilayer capacitors  
**29** Pb glass  
**32** PbO in lasers  
**34** Pb in potentiometers

## Pack 23 (Annex III):

**4f** Hg lamps  
**8b & 8b(I)** Cd electrical contacts  
**9a-II** CrVI in refrigeration  
**13a** Pb glass  
**13b & 13b-I/-II/-III** Cd & Pb glass  
**15 & 15a** Pb solder flip chip

BioIS et

## Pack 21 (Annex IV):

1, 1a, 1b, 1c, 2, 3, 5, 11, 13, 14, 15, 17, 26, 29, 31a, 39

## Pack 27 (Annex III & IV):

Part 1: a new exemption,  
~~Annex III- 6a, 6b, 7a, 7c, 15, 18b,~~  
Annex IV- 1a, 1b, 1c, 10  
Part 2: a new exemption, Annex III- 8b, 13a, 13b, 34, 42, 44,  
Annex IV- 4, 9, 46

# EU RoHS

## Exemption Drafts



# Public Consultation

**In January, the EU Commission submitted drafts to the WTO/TBT committee**

Included the following exemptions from Annex III:

Exemptions 6(a)/6(a)I/II – Lead in steel

Exemptions 6(b)/6(b)I/II/III – Lead in aluminium

Exemption 6(c) – Lead in copper alloys

Exemptions 7(a)/7(a)I-VII – Lead in high melting temperature solder

Exemptions 7(c)I/II/V/VI – Lead in glass/ ceramics

**The drafts stated an expected adoption date of March 2025 and an implementation three months later**

# Summary of Exemption Drafts – 6 Series

## Exemption 6a

- 6a, 0.35% Pb in steel for machining **and** in galvanised - **To expire 12 months after publication**
- 6aI, 0.35% Pb in steel for machining - **expires 31 December 2026 (all categories)**
- 6aII, 0.2% Pb in steel for galvanising - **expires 31 December 2026 (all categories)**

## Exemption 6b

- 6b, 0.4% Pb in Al - **To expire 12 months after publication**
- 6bI, 0.4% Pb in Al from scrap - **Expires 31 December 2026 (Cat. 9&11), or after 12 months (all other Cat.)**
- 6bII, 0.4% Pb in Al for machining - **Expires 31 December 2026 (Cat. 9&11), or after 12 months (all other Cat.)**
- 6bIII, 0.3% Pb in Al from scrap - **Expires 31 December 2026 (All except Cat. 9&11)**

## Exemption 6c

- 6c, 4% Pb in Cu alloys - **expires 31 December 2026 (all categories)**

## All 6 series exemptions

**Additional restrictions on the release rate of lead apply only to accessible parts that may be placed in children's mouths.**

# Summary of Exemption Drafts – 7a

## Exemption 7a

- 7a, Pb in high melting temp. solders - Expires 31 December 2026 (all categories) To be replaced by 7aI-VII

## Pb in high melting temp. solders for... All expiring 31 December 2027 (all categories)

- 7aI,... internal interconnections for attaching die with  $>0.1A$ ,  $>10V$  or, die edges larger than  $0.3mm^2$
- 7aII,...integral die attach connections with  $>35W/(m*K)$ ,  $>4.7MS/m$  and  $T_m >260^{\circ}C$
- 7aIII,... 1st level solder joints that must not reflow when second level solder is applied
- 7aIV,... 2nd level solder joints for ceramic ball grid arrays or high-temp plastic overmouldings ( $>220^{\circ}C$ )
- 7aV,... as a hermetic sealing material between specified components
- 7aVI,... in lamp components for specified uses
- 7aVII,... for audio transducers operating  $>200^{\circ}C$

# Summary of Exemption Drafts – 7c

## Exemption 7c

- 7cI, Pb in glass or ceramic other than in capacitors (piezoelectric or glass/ceramic matrix compounds) – [Exp. 31 December 2026 \(all categories\)](#) **To be replaced by 7cV & VI**
- 7cII, Pb in dielectric ceramic capacitors for >125V(AC) or >250V(DC) – [Exp. 31 December 2027 \(all categories\)](#)
- 7cV lead in a glass or glass matrix compound that fulfils any of the following functions...  
[All expiring 31 December 2027 \(all categories\)](#)
  1. ... protection and insulation in glass beads of HV diodes and glass layers for wafers on Pb-Zn/Si-borate
  2. ... for hermetic sealing between ceramic, metal and/or glass body.
  3. ... for bonding purposes in a process parameter window for <500C and with a viscosity of 1013.3dPas
  4. ... resistive materials (e.g.ink) with resistivity between 1Ω/square and 1MΩ/square
  5. ... for chemically modified glass surfaces in microchannel plates (MCPs), channel electron multipliers (CEMs), and resistive glass products (RGPs).
- 7cVI lead in a glass or glass matrix compound that fulfils any of the following functions...  
[All expiring 31 December 2027 \(all categories\)](#)
  1. ... for use in piezoelectric lead zirconium titanate (PZT) ceramics
  2. ... for providing ceramics with a positive temperature coefficient (PTC)

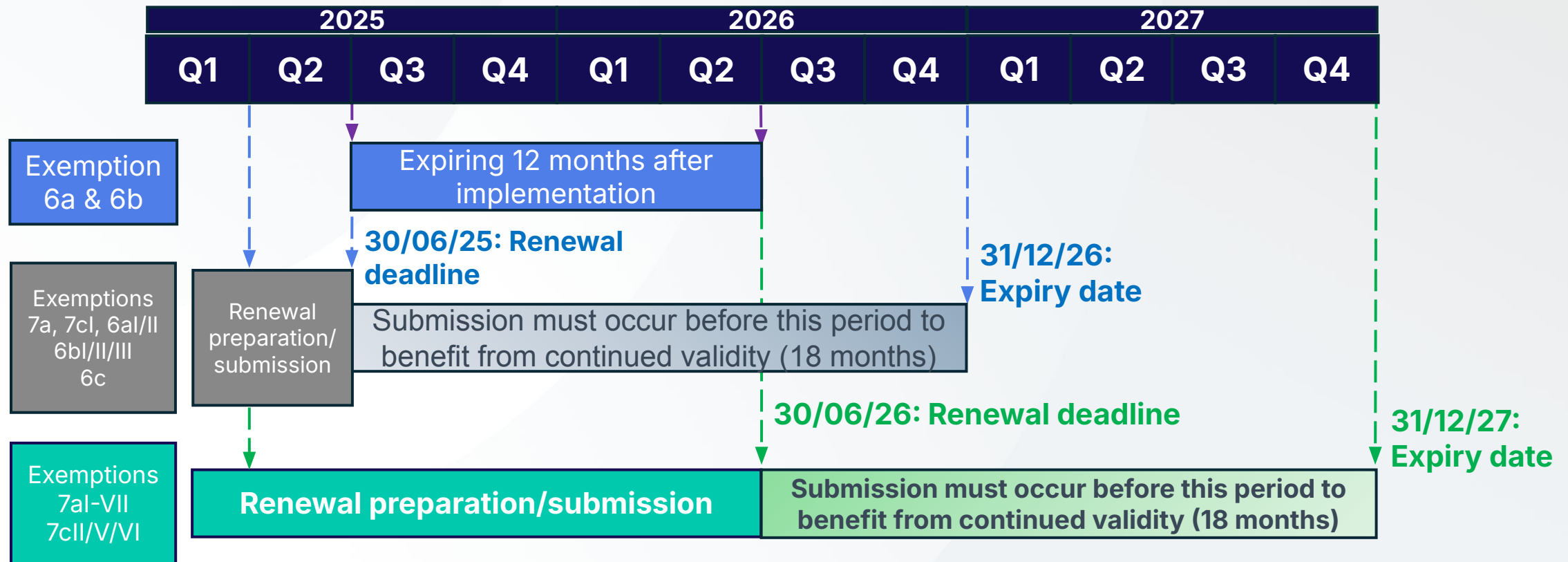
# Public Consultation

**In January, the EC also opened a public consultation period following the draft publication**

Exemption	Number of public responses	Main response themes
6(a)/6(a)I/II	54	Longer timelines required Concerns over 'release rate of lead' clause
6(b)/6(b)I/I/III		
6(c)		
7(a)/7(a)I-VII	41	Longer timelines required Concerns that sub-exemptions will not cover all uses
7(c)I/II/V/VI	74	

# RoHS Renewal Timelines

**Jan 2025:** Drafts submitted to WTO/TBT  
**10 Feb 2025:** Public consultation feedback deadline  
**March 2025:** Expected date of adoption



# Impact to Industry

- **Are your suppliers declaring the use of valid exemptions?**
  - 6a and 6b expire 12 months after implementation of the draft wording – ensure your suppliers are no longer declaring their use
- **Does the change of lead permitted in steel or aluminium affect your components?**
  - Check that your suppliers are aware of the changes so that your products remain compliant
- **Are any of your components made from lead-containing alloys accessible and could they fit in a child's mouth?**
  - If a components is smaller than 5 cm in one dimension it is considered "mouthable"
  - If so, can you demonstrate the lead release rate?
  - Can you use non-lead containing alloys for these parts?
- **Are your uses covered by the sub-exemptions proposed for Exemptions 7a and 7c?**
  - Check with your suppliers
  - If your uses are **not** covered by the sub-exemptions, reach out to your trade associations immediately – the deadline to submit renewals for the original wording is **30 June 2025**

## Key dates

**30 June 2025** – Renewal expiry date for all the renewable 6 series and 7a and 7cl  
**12 months after implementation** – Exemptions 6a and 6b expire  
**31 Dec 2026** – Expiry of the renewable 6 series, 7a and 7cl

# RoHS

Future EU developments  
and UK update



# RoHS Exemption Forecast

Oeko

## Pack 22:

**6a** Pb in steel  
**6a-I** Pb in steel for machining and hot dip galvanised steel  
**6b** Pb in Al  
**6b-I** Pb in Al from scrap  
**6b-II** Pb in Al for machining  
**6c** Pb in Cu  
**7a** Pb in high melting temperature solder  
**7c-I** Pb in glass or ceramic  
**7c-II** Pb in dielectric ceramic in capacitors etc.

**Draft published Jan '25**

## Pack 24:

**18(b)** Pb in lamps (suntanning)  
**18(b)-I** Pb in lamps (medical)  
**24** Pb solder multilayer capacitors  
**29** Pb glass  
**32** PbO in lasers  
**34** Pb in potentiometers

**Draft planned for Q3 '25**

## Pack 23 (Annex III):

**4f** Hg lamps  
**8b & 8b(I)** Cd electrical contacts  
**9a-II** CrVI in refrigeration  
**13a** Pb glass  
**13b & 13b-I/-II/-III** Cd & Pb glass  
**15 & 15a** Pb solder flip chip

## Pack 21 (Annex IV):

1, 1a, 1b, 1c, 2, 3, 5, 11, 13, 14, 15, 17, 26, 29, 31a, 39

BiolS et

## Pack 27 (Annex III & IV):

Part 1: a new exemption, ~~Annex III- 6a, 6b, 7a, 7cI,~~ 15, 18b, Annex IV- 1a, 1b, 1c, 10  
Part 2: a new exemption, Annex III- 8b, 13a, 13b, 34, 42, 44, Annex IV- 4, 9, 46

**Next pack potentially Q2 2026?**

# Other EU RoHS Developments

## IEC 63000-2018 (Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances) updates

Currently does not mandate testing to confirm that a product is RoHS Compliant. However,

- In Nov '24, the EC proposed that IEC 63000-2018 should be updated to align with Decision No 768/2008/EC
- Stated that materials potentially posing a risk should undergo testing, and as *"there is a general risk for EEE containing hazardous substances, as a general rule, test results should therefore be a mandatory part of the technical documentation"*

### Potential impact

- Though not all homogenous materials in a product would have to be tested, all those judged to be "at risk" of containing the restricted substances may have to be tested.
- Cenelec due to deliver the final report 32 months after notification of the decision – therefore no changes likely before 2028

### Other updates

- ECHA to review future exemption renewal applications
- Proposals to add TBBP-A and MCCPs to the restricted substances list were abandoned in December 2024

# UK RoHS

- Based on the same principles at EU RoHS
- Same categories and list of restricted substances
- Exemptions renewals cost £39,721 – to be paid on submission

## Exemptions

- Large number of transitional cases – likely to follow the lead of their EU equivalents
- Public consultation open for four UK exemptions:
  - UK Ex. 54 (EU III-42) Lead in Bearings and Bushes of Diesel and Gaseous Fuel-Powered Engines
  - UK Ex. 53 (EU III-41) Lead Solder in Engine Control Units (ECUs) of Combustion Engines
  - UK Ex. 9 (EU III-4f) Mercury in Discharge Lamps for Special Purposes
  - UK Ex. 69 (EU IV-9) Helium Cadmium Lasers in Raman Spectroscopy

**Closing date for consultations is 4 May 2025**



Compliance & Risks

Holistic Market Access Solutions

# A Smarter Way to Manage Product Compliance



# Supporting Your Product Compliance Journey



Identify Relevant Regulations



Upcoming & Proposed Regulatory Changes



Communicate Compliance Requirements



Manage Evidence Documentation



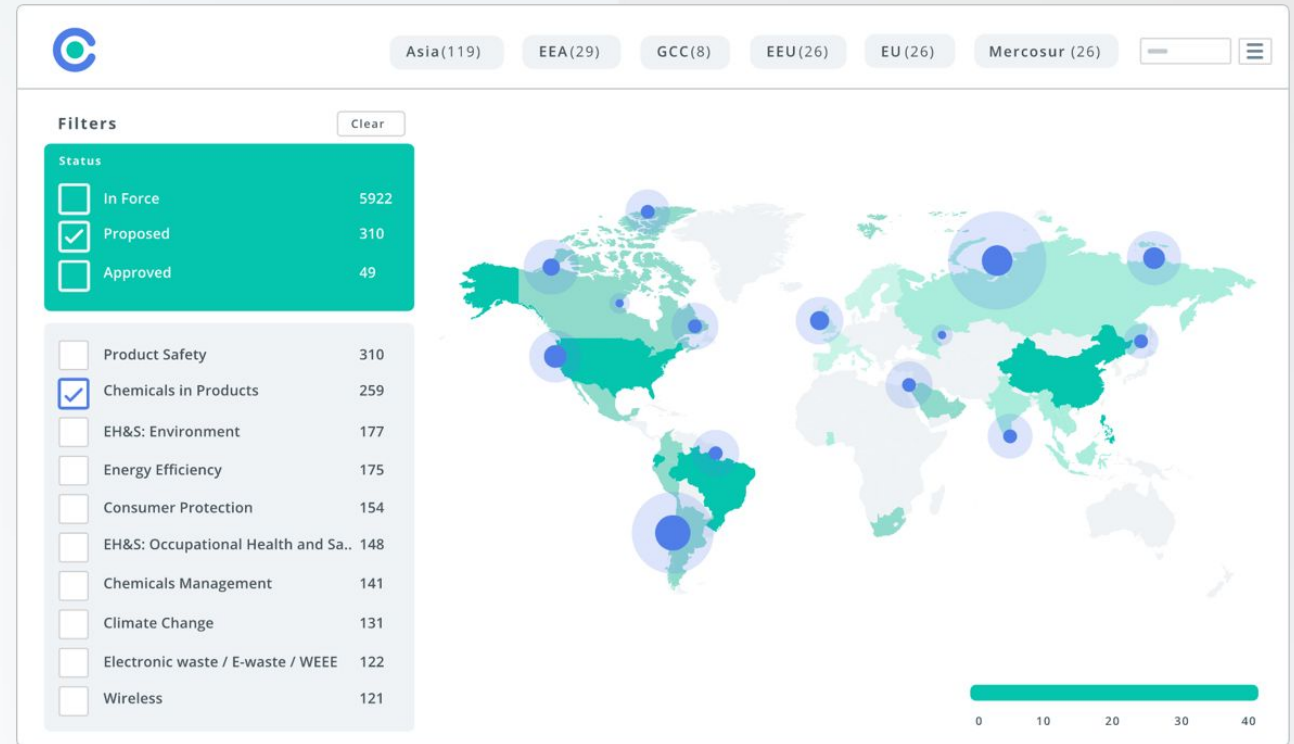
# Extensive Regulatory Content Coverage

With C2P you have access to **100,000+** regulations, Standards & Product Requirements that enable you to gain and maintain market access for all your products globally.

- Artificial Intelligence (AI)
- Batteries
- Brexit
- California Proposition 65
- Carbon Footprint
- Chemicals in Products
- Chemicals Management
- Circular Economy
- Climate Change
- Conflict Minerals
- Consumer Protection
- COVID-19
- Cybersecurity
- Data Protection
- Drinking Water
- Ecodesign
- Ecolabeling
- Electromagnetic Compatibility (EMC)
- Electronic Waste / E-Waste / WEEE
- Energy Efficiency
- Explosive Atmospheres / ATEX
- EU Reach
- Food Contact Materials and Articles
- Globally Harmonized System (GHS)
- Illegal Logging
- Nanotechnology
- Packaging
- Product Safety
- Single-use Plastics
- Transboundary Movement of Hazardous Waste
- Transport of Dangerous Goods
- Water Efficiency
- Wireless

# Manage all your Product Compliance in One Place...

- Design, build & collaborate on new products with confidence
- Keep all [compliance evidence](#) up to date & [live linked](#) back to their Regulations, Standards & Requirements
- Continually [monitor regulatory changes](#) & [keep ahead of proposed changes](#) before they happen



# Industry Coverage



**Consumer  
Electronics**



**Apparel**



**Household  
Appliances**



**Medical  
Devices**



**Home  
Furnishings**



**Automotive**



**Textile  
Manufacturing**



**Power Tools &  
Garden  
Machinery**



**Leisure &  
Sporting  
Equipment**

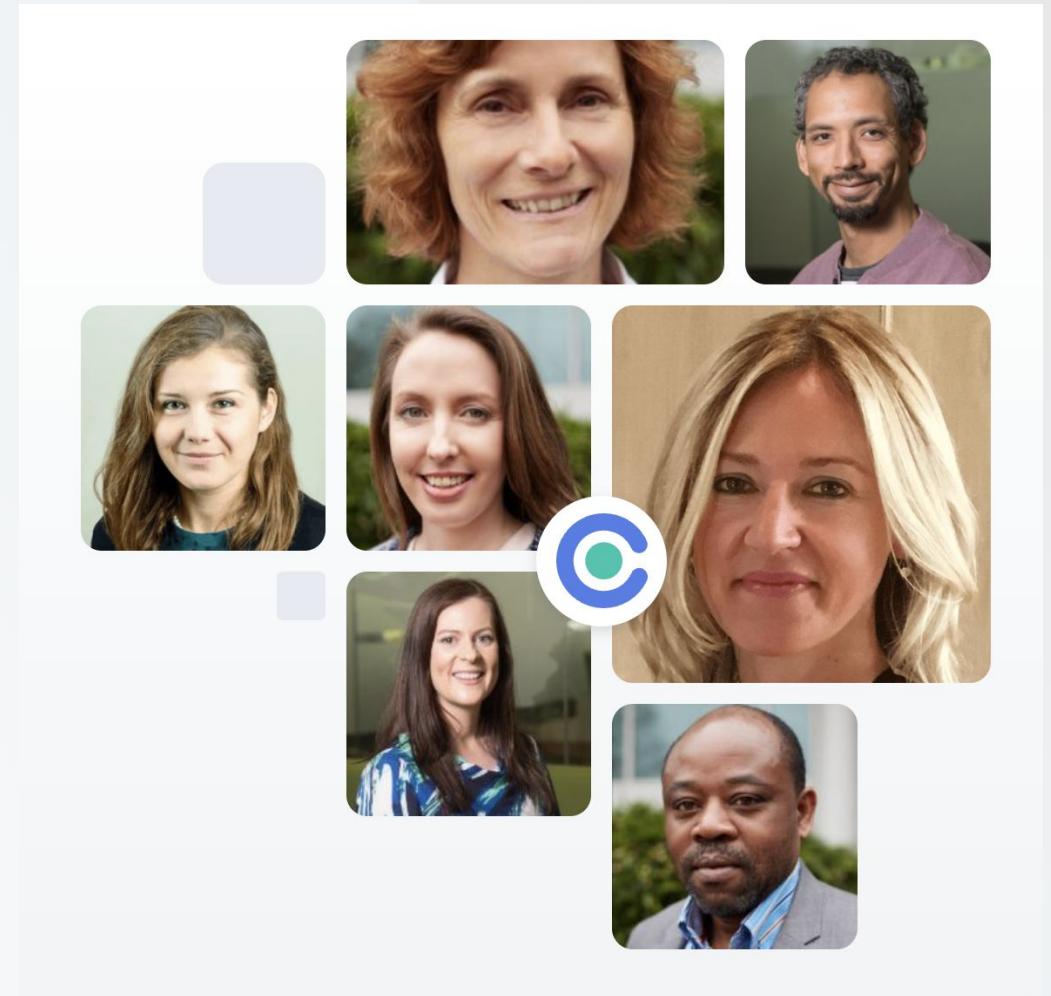


**General &  
Online Retailers**



# Ask our Experts at the click of a button...

- 50+ Subject Matter Experts
- Extensive Knowledge Partner network
- Expertise across products, geographies & policy areas
- Addressing questions on laws & regulations including purpose, applicability, requirements highlights & more.



# Questions?



# Lets Talk



**Maciek Hulme**  
Senior  
Regulatory  
Engineer, RINA



**Orlaith Morris**  
Content Marketing  
Manager,  
Compliance & Risks

