

Copper & Brass Alloys – RoHS Frequently Asked Questions

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 I take effect?

The restrictions in RoHS became effective with electrical and electronic equipment put on the market on and after July 1, 2006.

Which companies are affected by RoHS I?

Any business that sells electrical and electronic equipment to EU countries, including resellers, distributors or assemblers that sell products to EU countries, is impacted if they utilize materials restricted by RoHS I.

Are copper & brass alloys that contain lead affected by RoHS I?

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.

What about RoHS II?

In 2008, the EU launched a revision of RoHS. This process was completed in 2011 when Directive 2011/65/EU, informally known as RoHS II, was adopted. RoHS II became effective in January 2013, replacing RoHS I. The exemption process in RoHS II was also amended. The four-year review process of RoHS I, which was to be automatically conducted by the government, was abolished. Instead, under RoHS II, the burden was placed on parties wishing to maintain an exemption to file an application for renewal 18 months before expiry.

Are copper & brass alloys that contain lead also exempt from RoHS II?

Yes. The exemption for copper and brass alloys containing lead up to 4% was retained in RoHS II but with an expiry date of July 21, 2016.

Will the RoHS II exemption for copper & brass alloys be allowed to expire on July 21, 2016?

No. A formal application to renew the exemption for copper and brass alloys containing lead up to 4% was successfully filed by an industry working group on January 16, 2015 before the submission deadline. The European Commission is obligated to decide on the application no later than January 21, 2016 which is six (6) months before the expiry date of the exemption.

Will the RoHS II exemption application for copper & brass alloys be accepted?

Although the success of the application cannot be predicted or guaranteed, periodic updates will be provided on the websites of the Copper and Brass Fabricators Council (www.cbfc.us) and the Copper Development Association (www.copper.org) to keep interested parties informed of how the process is proceeding.

Who can I contact for more information?

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