



# EU Releases Draft Revision of RoHS Lead and Cadmium Exemptions

On July 8, 2026, the European Commission proposed amendments to Annexes III and IV of the RoHS Directive, updating exemptions for lead and cadmium in specific electrical and electronic equipment.

**Key revisions:** Further refinement of applicable scenarios for lead and cadmium exemptions under Annexes III and IV, along with updated expiration dates.

**Scope of revisions:** Annex III: A total of 12 existing exemption entries were revised, covering applications such as fluorescent lamp glass, optical glass, discharge lamp phosphors, solder for capacitors, crystal glass, and cermet-based trimmer potentiometer elements. Annex IV: 6 entries were revised, with a focus on adjusting exemption rules for specialized applications including medical devices, industrial monitoring and control instruments, and superconducting equipment.

**Annexes III and IV are amended as follows:**

(1) in Annex III, points 5(b), 13(a), 13(b), 13(b)-(I), 13(b)-(II), 13(b)-(III), 18(b), 18(b)-I, 24, 29, 32, and 34 are replaced by the following:

'5(b)	Lead(not intentionally added)in soda lime glass used in the glass tube of fluorescent lamps,not exceeding 0,2%by weight	Expires on[same day as date of entry into force plus 30 months]for category 5.'
'13(a)	Lead in white glasses used for optical applications(excluding applications falling under any of points 13(b)to 13b-V of this Annex)	Expires on[same day as date of entry into force plus 30 months]for categories 3,4,6,7,8,9 and 11.'





'13(b)	Cadmium and lead used in filter glasses and glasses for reflectance standards	Expires on[same day as date of entry into force plus 12 months]for categories 8,9 and 11.'
'13(b)-I	Lead in ion coloured optical filter glass types	Expires on[same day as date of entry into force plus 30 months]for allcategories.
13(b)-II	Cadmium in striking optical filter glass types;excluding applications falling under point 39(a)of this Annex	
'13(b)-III	Cadmium and lead in glazes used for reflectance standards	Expires on[same day as date of entry into force plus 12 months]for categories 1 to 7 and 10.'
'13(b)-IV	Cadmium in glazes used for reflectance standards	Expires on[same day as date of entry into force plus 30 months]for categories 8 and 9.'
'13(b)-V	Lead compound coatings in infrared interference filters used in infrared gas analysis and mid-far-infrared spectroscopy	Expires on[same day as date of entry into force plus 30 months]for category 9 industrial monitoring and control instruments.'
'18(b)	Lead as activator in the fluorescent powder(1%lead by weight or less)of discharge lamps when used as sun tanning lamps containing phosphors such as BSP( $BaSi_2O_5:Pb$ )	Expires on[same day as date of entry into force plus 54 months]for categories 5,8,9 and 11.'
'18(b)-I	Lead as activator in the fluorescent powder(1%lead by weight or less)of discharge lamps containing phosphors such as BSP( $BaSi_2O_5:Pb$ )when used in medical phototherapy equipment	Applies to category 5 and 8 and expires on[same day as date of entry into force plus 12 months]'





'18(b)-II	Lead as activator in the fluorescent powder(1%lead by weight or less)of discharge lamps containing phosphors such as BSP(BaSi <sub>2</sub> O <sub>5</sub> :Pb)when used in medical phototherapy equipment,including extracorporeal photopheresis lamps	Expires on[same day as date of entry into force plus 54 months]for categories 5,8 and 9.'
'24	Lead in solders for the soldering to machined through hole discoidal and planar array ceramic multilayer capacitors	Expires on[same day as date of entry into force plus 18 months]for all categories.
'24(a)	Lead in alloys used for soldering to through hole discoidal and/or planar array ceramic multilayer capacitors i)Not exceeding 50%of lead by weight for applications where the components are mechanically mounted(e.g.by bolts,clips or screws)or bonded by a selective soldering/welding process and where the component will not exceed a temperature of 150°C ii)In high melting point solders containing≥85%of lead by weight for cases where the components are mounted using an elevated temperature process(e.g.solder reflow,welding)at a temperature of≥150°C or where the component is rated to operate at a temperature of≥150°C'	Expires on[same day as date of entry into force plus 54 months]for allcategories.
'29	Lead bound in crystal glass as defined in Annex I(Categories 1,2,3 and 4)of Council Directive 69/493/EEC(2)	Expires on[same day as date of entry into force plus 30 months]for categories 3,4,5 and 11.'





'32	Lead oxide in glass frit used as a sealing material for making window assemblies for argon and/or krypton laser tubes	Expires on[same day as date of entry into force plus 30 months]for categories 6,8,9 and 11.
'34	Lead in cermet-based trimmer potentiometer elements	Expires on[same day as date of entry into force plus 30 months]for allcategories.

(2) Annex IV is amended as follows:

**(a) point 1(b) is replaced by the following:**

'1(b) Lead anodes in electrochemical oxygen sensors.

Expires on [same day as date of entry into force plus 12 months].

1(b)-I Lead anodes in electrochemical sensors that measure oxygen concentrations of inhaled and/or exhaled air for patients and that are consumables in medical devices placed on the market before 26 May 2024.

Expires on [same day as date of entry into force plus 54 months] for category 8 medical devices other than in-vitro diagnostic medical devices.

1(b)-II Lead in galvanic oxygen sensors in instruments that are designed for the measurement of dissolved oxygen in concentrations below 30 ppb.

Expires on [same day as date of entry into force plus 54 months] for category 8 medical devices other than in-vitro diagnostic medical devices.

1(b)-III Lead anodes in galvanic capillary oxygen sensors in instruments that are designed for the measurement of oxygen in gases.





Expires on [same day as date of entry into force plus 54 months] for category 9 industrial monitoring and control instruments.

1(b)-IV Lead anodes in galvanic Hersch cells for oxygen sensors where sensitivity below 100 ppm is required.

Expires on [same day as date of entry into force plus 54 months] for category 9 industrial monitoring and control instruments.

1(b)-V Cadmium anodes in Hersch cells for oxygen sensors where sensitivity below 100 ppm is required.

Expires on [same day as date of entry into force plus 78 months] for category 9.

1(b)-VI Lead anodes in galvanic permeable membrane oxygen sensors in instruments that are designed for the measurement of oxygen in gases.

Expires on [same day as date of entry into force plus 54 months] for category 9 industrial monitoring and control instruments.’;

**(b) point 4 is replaced by the following:**

’4. Lead in glass frit of X-ray tubes and image intensifiers and lead in glass frit binder for assembly of gas lasers and for vacuum tubes that convert electromagnetic radiation into electrons.

Expires on [same day as date of entry into force plus 12 months] for categories 8 and 9.

4(a). Lead in glass frit binders for assembly of HeNe gas lasers used in heterodyne interferometry calibration and heterodyne interferometry positioning applications.





Expires on [same day as date of entry into force plus 30 months] for category 9 industrial monitoring and control instruments.');

**(c) point 9 is replaced by the following:**

'9. Cadmium in helium-cadmium lasers.

Expires on [same day as date of entry into force plus 12 months] for category 9.

9(a). Cadmium in helium-cadmium lasers of Raman spectrometers for stress measurement in semiconductors.

Expires on [same day as date of entry into force plus 30 months] for category 9 industrial monitoring and control instruments.');

**(d) point 11 is replaced by the following:**

'11. Lead in alloys as a superconductor and thermal conductor in magnetic resonance imaging (MRI).

Expires on [same day as date of entry into force plus 12 months].

11(a) Lead in alloys as a superconductor in MRI devices and nuclear magnetic resonance (NMR) devices.'

Expires on [same day as date of entry into force plus 78 months].';

**(e) point 12 is replaced by the following:**

'12. Lead and cadmium in metallic bonds creating superconducting magnetic circuits in MRI, SQUID, NMR (Nuclear Magnetic Resonance) or FTMS (Fourier Transform Mass Spectrometer) detectors.





Expires on [same day as date of entry into force plus 12 months].<sup>1</sup>

12(a) Lead in metallic bonds creating superconducting electric circuits in superconducting quantum interference device (SQUID) detectors.

Expires on [same day as date of entry into force plus 78 months].<sup>2</sup>;

**(f) point 34 is replaced by the following:**

'34. Lead as an activator in the fluorescent powder of discharge lamps when used for extracorporeal photopheresis lamps containing BSP (BaSi<sub>2</sub>O<sub>5</sub>:Pb) phosphors.

Expires on [same day as date of entry into force plus 12 months].

**Original link:** <https://ec.europa.eu/Hazardous-substances-exemption>

## HCT SOLUTION:

In response to the latest EU exemption revisions, we rapidly identify restricted substance levels—such as lead and cadmium—in your products and determine applicable exemption clauses, ensuring smooth market access for your exports. Waltek HCT maintains continuous tracking and in-depth analysis of evolving international and domestic regulations. We are equipped with state-of-the-art instrumentation, a highly professional operations team, and extensive testing expertise to support your compliance needs.

