

# Request for cooperation in substitution regarding exemption of lead from EU RoHS (lead in aluminum alloys)

Nov 28, 2025

Dear All Valued Suppliers

On November 21, 2025, the exemption (Pack 22) of RoHS Directive was amended and published in the Official Journal. In response, our company will continue to promote substitution activities related to the relevant exemptions. In addition to the uncertainty surrounding the status of extension applications, some exemptions have short deadlines—only 12 months at the shortest—after the Official Journal enter into force. Therefore, prior to revising the next version of our Investigation Manual for Regulated Chemical Substances, we kindly ask for your cooperation regarding the following points.

## Requests:

We request your cooperation with the following alternative activities related to the exemptions.

- 1) Consideration of alternatives for Pack 22, which includes lead in aluminum alloys  
(alternative candidates and schedules)
- 2) Report of information on contained chemical substances  
In details, we will provide separately.

## Reference (Official Journal related to Pack 22)

- Lead as an alloying element in steel, aluminum and copper:  
[https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L\\_202502364](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202502364)
- Lead in high melting temperature solders:  
[https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L\\_202501802](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202501802)
- Lead in glass or ceramic components:  
[https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L\\_202502363](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202502363)

## Revise of Management Category (Rank):

For the RoHS exemptions listed below, which will not be granted an extension, this letter notifies you that we will revise “the Management Classification” and “the Time of Total elimination” in Attachment 2. Exempted Application List of the Investigation Manual for Regulated Chemical Substances.

Management Classification	Usage code		Description	Time of Total elimination
	Laws & regulations	Code		
<b>B</b> <b>A1</b>	RoHS	6(b)-I	Lead as an alloying element in aluminum containing up to 0,4 % lead by weight, provided it stems from lead-bearing aluminum scrap recycling	<del>Deadline=</del> <b>undetermined</b> <b>2026-06-11</b>
<b>B</b> <b>A1</b>	RoHS	6(b)-II	Lead as an alloying element in aluminum for machining purposes with a lead content up to 0,4 % by weight	<del>Deadline=</del> <b>undetermined</b> <b>2026-12-11</b>

For exemptions other than those listed above, the Time of Total elimination will be determined depending on the future status of extension applications.

We appreciate your cooperation in this matter.

Sincerely,

Makoto Tami  
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Global Purchasing, Quality and Logistics Headquarter  
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