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# Material Declaration Training

## RoHS Exemptions

*This 'Quick Start' guidance can be used by you, colleagues and suppliers to quickly understand the basics of collecting Material Declaration (MD) data for your product(s)*

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# Material Declaration Training

## 100 Series: Material Regulations

Regulation Overviews  
RoHS  
REACH  
Conflict Minerals  
CA Prop 65  
Canada DSL

## 200 Series: Reporting Parts

Workflow & Examples  
Reporting Options  
Report Training & Templates  
Supplier Data Requirement  
Letter Templates  
Supporting Details

You  
Are  
Here

## 300 Series: Project Management

Assessment  
Planning  
Execution  
Simplified Reporting  
Advanced Techniques  
Additional Resources

Training materials may be found on web page:  
<http://rohsready.org/training.html>



# Roster of Training – 200 Series

## Reporting Material Declarations

- #200 - Reporting a Part (Item)
- #201 - Selecting a Reporting Option
- #202 - Reporting in FMD Format
- #203 - Reporting in Specific MD Format
- #204 - Template for FMD Format
- #205 - Template for Specific MD Formats
- #206 - Supplier Requirement Letter Template
- #207 - Decomposition of BoMs (for Items & Building an MD-BoM)
- #208 - Material and Substance Identification & Weights
- #209 - RoHS Exemptions
- #210 - Substance Not Specifically Reportable
- #211 - Reviewing MD inputs from suppliers
- #212 - Applicability and Exceptions
- #213 - Units Conversion Guide

You are Here

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# RoHS Exemptions

This guidance will help you learn recommended methods for planning and executing your Material Declaration data collection project

Key topics:  
Exemptions Overview  
Applicability  
Sources of information



# RoHS Exemptions Overview

## ➤ Exemptions for RoHS

- This overview covers the Exemptions for the RoHS Regulation ( Directive 2011/65/EU )

Please review any Exemptions with your Material Compliance, Regulatory, EHS, Quality or Stewardship leader to confirm specific interpretations or application



# RoHS Exemptions Overview

## ➤ Exemption Definition - RoHS

Exemptions permit the existence of substances restricted by the regulation, above the allowed threshold;

(invoking any, all or none of the below)

- Under stated uses or application at a product, part or material level
- Often to a new threshold level for the substance
- Within a certain time period (until expiration date)

## ➤ Official list of RoHS Exemptions

Published in Annex III and Annex IV of Directive 2011/65/EU

[IPC-1752A Appendix B](#) for reference list



# RoHS Exemption Overview

## ➤ RoHS Exemption Application

Exemptions are granted (provided) for:

Specific substances, used in specific applications

- Not for all EEE equipment
- Nor for a whole company or its' products

In reporting for RoHS, Exemptions may be invoked for materials, parts, assemblies or products which contain the specific substances and meet the application criteria



# RoHS Exemption Overview

## ➤ RoHS Exemption Application

Note – the application criteria for a substance may occur at a level of assembly or product, above the part / item / article your company produces

In reporting for RoHS, do not invoke / report an exemption if the application condition exists higher up the supply chain

- Report existence of substance above threshold
- Provide to your Customer – even if non-compliant at your part / item / article level
  - Enables proper Customer visibility
  - Customer will address applicability of Exemption





# RoHS Exemption Overview

## ➤ RoHS Exemption Identification

Exemptions are in 2 Annex groups: Annex III and Annex IV

Annex III - Exemptions available to all EEE

(including medical devices and monitoring & control instruments)

Annex IV – additional Exemptions specific to medical devices and monitoring and control instruments

## ➤ Identification Note

- The sets of Exemptions in each Annex group begin their identification numbering at 1
- Make sure to include Annex group in identification, e.g. Annex III-Exemption 6(b) or III-6(b)



# RoHS Exemption Overview

## ➤ RoHS Exemption Validity Periods

Exemptions may or may not have stated expiration dates,  
BUT, All have an eventual expiration date per below:

(Unless application for renewal is made and granted for specific cases),

### Maximum Validity Periods for RoHS Exemptions when No Expiration Date is stated

#### Exemptions

EEE categories	Annex III	Annex IV
1 thru 7 and 10	21 July 2016	Not applicable
8 and 9 general	21 July 2021	21 July 2021
8 in-vitro	21 July 2023	21 July 2023
9 industrial	21 July 2024	21 July 2024

Summarized from: RoHS 2 FAQ document, 12 December 2012  
[http://ec.europa.eu/environment/waste/rohs\\_eee/pdf/faq.pdf](http://ec.europa.eu/environment/waste/rohs_eee/pdf/faq.pdf)



# RoHS Exemption Overview

## ➤ RoHS Exemption Update Tracking

Periodically review the RoHS Exemptions invoked for your parts / product

- Review for expiration dates
- Determine if any material, part or item needs updating, change of source, or removal
- Determine advanced time period for update actions
- Execute updates
- Update RoHS reporting

Link to EU Commission for updated information

*[Link to IPC Website – Exemption Updates](#)*



# RoHS Exemption Overview

## ➤ RoHS Exemption Example

Annex III – 7c(II):

**Substance**

**Application**  
(blue text)

Capacitor manufacturer can  
invoke Exemption;  
Di-electric ceramic material  
manufacturer cannot

‘Lead in dielectric ceramic in capacitors for a rated  
voltage of 125 V AC or 250 V DC or higher’

(no stated expiration date)

Expiration date -  
See ‘default’  
on sheet 10



# Next Steps

- Review any substances above threshold for the potential of invoking RoHS Exemptions  
Ref - #200
- Define a tracking and periodic review process for parts / items with RoHS Exemptions and expiration dates
  - **Note default expiration dates when no specific date is stated**



# Additional Resources

Please see [www.RoHSReady.org](http://www.RoHSReady.org)  
for additional resources