

RoHS Directive 2011/65/EU

- Lead limited to 0.1 % by weight per homogeneous material, transposed into national law in every Member State.
- Applies to electrical and electronic equipment, not to individual pipework components.
- Exemption 6(c): up to 4 % Pb in copper alloys, expiry date set uniformly at 30.06.2027 by Delegated Directive (EU) 2025/2364 of 08.09.2025.
- New since 01.07.2026: footnote to 6(c) for equipment with parts accessible to children, lead release max. 0.05 µg per cm² and hour.

EU Drinking Water Directive (EU) 2020/2184

- Permanent drinking water contact is reserved for listed materials, subject to the transitional arrangements to 2032. Listing does not replace the product-level conformity confirmation.
- The European positive lists under Implementing Decision (EU) 2024/367 apply from 31.12.2026, and the national approval schemes stop being the route to market.
- Art. 3: nationally approved starting substances may still be used in manufacturing until 31.12.2032, provided 5 µg/l Pb at the tap is met.
- Entries in the first European positive lists carry staggered expiry dates. What counts is the expiry date of the entry, not the material name.

Deadlines at a glance

12.12.2025 Renewal application for 6(c) filed. Under Art. 5(5) the exemption stays valid until the Commission decides.
01.07.2026 Footnote to 6(c) applicable. Stating conformity under 6(c) alone is no longer sufficient.
31.12.2026 European positive lists apply, national schemes expire. Manufacturing route under Art. 3 stays open until 31.12.2032.
30.06.2027 Expiry date of exemption 6(c). If the renewal is refused, it expires under Art. 5(6) no earlier than 12 and no later than 18 months after the decision.
31.12.2032 Both transitional routes close. From then on only the EU framework applies.

National approvals: what applies in your market

Country and national scheme	What happens
France , ACS	Applies until 31.12.2026. Certificates valid on that date stay usable in the transitional period, at the latest until 31.12.2032.
Netherlands , Kiwa ATA	Applies until 31.12.2026, then the same transitional arrangement.
Poland , atest higieniczny (NIZP PZH-PIB)	No hygienic certificate for new products from 01.01.2027. Certificates valid on 31.12.2026 can be extended, not beyond 31.12.2032.
Austria , ÜA marking, ÖVGW certification	No new registration certificates after 31.12.2026. Existing ones can be renewed, but not widened to further product types. Transition until 31.12.2032.
Germany , UBA metal assessment basis	Same arrangement, but the national lead limit at the tap already drops to 5.0 µg/l on 12.01.2028, and time-limited material entries end on 11.01.2028.
Switzerland , SVGW certification	Outside the EU framework, national route under Swiss food law. Products placed on the EU market must meet the EU rules wherever they are built.

Materials compared

Material	Pb content	RoHS	Drinking water
CW614N / CW617N free-cutting brass	approx. 1.6 to 3.5 %	only via exemption 6(c), time-limited	not in Annex II, time-limited national entries only
Gunmetal CC499K CuSn5Zn5Pb2-C	0.2 to 3.0 %	only via exemption 6(c), time-limited	not in Annex II, time-limited national entry only
Gunmetal CC470K CuSn4Zn2PS-C	max. 0.10 %*	compliant without exemption	Annex II, entry 1657
CW511L-DW lead-free our series specification	max. 0.10 %*	compliant without exemption	UBA entry 2.5.3.2 without expiry date, 4MS list; Art. 3 transition until EU inclusion
CW511L-DW / CW510L-DW low-lead, standard range	up to 0.2 %	above 0.1 %, only via 6(c)	CW510L-DW in Annex II; CW511L-DW standard entry only until 11.01.2028 (DE)
CW510L-DW lead-free not dezincification resistant	max. 0.10 %*	compliant without exemption	Annex II
CW724R-DW silicon brass, lead-free	max. 0.10 %*	compliant without exemption	Annex II, entry 1658
Stainless steel V2A / V4A 1.4301, 1.4404, 1.4571	structurally lead-free	compliant without exemption	listed, V4A more resistant to chloride

* Lead-free according to our delivery specification: Pb max. 0.10 % by weight. For CW511L-DW additionally As 0.02 to 0.10 % and Ni max. 0.10 %. Mill and material certificates as well as further certificates are provided on request. Figures refer to the material level; product conformity additionally covers filler materials, surfaces and seals.

What this means for you

- **Equipment or component?** A purely hydraulic manifold is not electrical equipment. With an actuator, pump, controller or heat exchanger, RoHS applies through the equipment: heat pumps usually category 1, stations usually category 11.
- **The material name is not enough.** Conformity under 6(c) says nothing about the lead content; what decides is the delivered composition with a valid list entry.
- **Your national approval has a shelf life.** Whatever is not certified by 31.12.2026 goes through the EU route, and what is certified runs out by 31.12.2032 at the latest.
- **Time window.** If 6(c) is not renewed, Art. 5(6) leaves at most 18 months. Companies that have made the changeover reckon with at least two years.

How SferaTec is set up

- Our range covers the common hydraulic components. A large part is already available in CW511L-DW or CW724R-DW; everything beyond that we produce to customer specification lead-free.
- Materials: CW511L-DW, CW510L-DW, CW724R-DW and stainless steel, selected by medium and duty. Optional high-performance electroplated coating for longer service life.
- Evidence: mill and material certificates on request, plus declarations on RoHS, REACH and drinking water for documentation to EN IEC 63000.

Send us your part list. We assign your positions to suitable materials and agree the next steps with you.

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Version October 2026, no legal assessment of the individual case. The applicable versions of Directive 2011/65/EU, Directive (EU) 2020/2184, the associated legal acts and their national transposition prevail. The declaration of conformity for the equipment is the responsibility of the equipment manufacturer.