ECIA Industry Alert: November 2, 2026 – RoHS Exemption Update

(Environmental)

In September 2025, the European Commission adopted renewal decisions for several EU RoHS Annex III exemptions, including exemptions used frequently in electronics such as 7(a), 7(c)-I, 7(c)-II, 6(a), 6(b), 6(c) and more.

Several commonly used exemptions are approaching their scheduled expiration dates. Some existing exemptions have been replaced or divided into more specific sub-exemptions, requiring manufacturers to reassess the applicability of previously claimed exemptions. Examples include new 6(a)-II, 6(b)-III ,7(a)-I through 7(a)-VII , 7(c)-V and 7(c)-VI sub-exemptions.

Under Article 5(5) of the EU RoHS Directive, exemptions with qualifying renewal applications submitted within the required timeframe remain valid beyond their expiration dates until the European Commission issues its decision. However, this provision does not automatically apply to all exemptions. The renewal status, applicable product category, scope, and expiration date must be evaluated individually.

Common exemptions with upcoming expirations and renewal requests include:

Exemption	Category	Expiration	Current Status
6(a)	All	12/11/2026	Not valid after expiration
6(b)	8, 9, 11	6/11/2027	Not valid after expiration
6(c)	All	6/30/2027	Remains valid pending renewal
7(a)	All	6/30/2027	Remains valid pending renewal
7(c)-I	All	6/30/2027	Remains valid pending renewal
7(c)-II	All	12/31/2027	Not valid after expiration

This is not an exhaustive list, only certain common exemptions are shown. Be sure to keep track of ongoing changes to these and other exemptions at the link below. It is important to research application details, description, categories and validity of exemptions. More information can be found on the European Commission website: RoHS Directive implementation - Environment - European Commission

Finally, remember that not all global RoHS regulations are aligned with EU RoHS and exemptions and these requirements must be evaluated independently.