U.I. Lapp GmbH · Schulze-Delitzsch-Straße 25 · 70565 Stuttgart

01.10.2025

To our valued customers

RoHS II & Directive 2017/2102 amending Directive 2011/65/EU

(RoHS II) General statement

The “RoHS II” Directive 2011/65/EU restricts the use of certain substances in electrical and electronic equipment (EEE). It has replaced the old RoHS 2002/95/EC since 2013. The European Directive 2015/863/EU has added four substances to RoHS Annex II. These new restrictions came into force on 19th July 2019.

The Directive 2017/2102 is an amendment which clarifies the scope of RoHS II and is effective from 11 December 2017. All Member States had to adopt this Directive by 12 June 2019.

Scope

RoHS II has extended the previous scope and has introduced the new category 11 that covers all “other EEE not covered by any of the [previous] categories”. On the other hand, the existing scope exclusions have been updated, including large-scale stationary industrial tools and large-scale fixed installations, as well as means of transport, non-road mobile machinery for professional use or certain photovoltaic panels and R&D equipment. Cables with nominal voltage of less than 250V usually fall under category 11 (“other EEE”), or are not considered EEE themselves, i.e. in case they are applied as wiring that is contained within or integral to, EEE.

The Directive 2017/2102 modifies RoHS II in terms of scope- and exemption clarification and removes the deadline for the Commission to take a decision on a renewal of exemption applications. Up to now, the decision had to be made no later than six months before the expiry date of the existing exemption. A realistic deadline for a decision shall be included in the general review of RoHS II which has to be carried out by 22 July 2021. In terms of scope clarification the Article 2 paragraph 2 was removed, allowing non-compliant EEE existing on the market to be made available to secondary market operations (such as repair, replacement of spare parts). Article 4 paragraph 3 has been updated to extend the scope of the EEE covered to all other EEE that were outside of RoHS I and which are placed on the market from 22 July 2019.

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Chairman of the Supervisory Board
Matthias Lapp

A Company of the LAPP Group

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the LAPP Group

LAPP Group position

The LAPP GROUP has attributed great importance to the subject of safety and the environment from a very early stage, and has been among the first to implement RoHS requirements systematically.

Irrespective of the scope of the RoHS II Directive, all products in the main catalogue of the Lapp Group are in compliance with the RoHS II Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment. These products do not contain any of the substances restricted by RoHS II or exceed the maximum concentrations stipulated therein, except for the Annex III exemptions of this Directive.

Substance	**Limit**	**Deadline**
Lead	0.1%	-
Mercury	0.1%	-
Cadmium	0.01%	-
Hexavalent chromium	0.1%	-
Polybrominated biphenyls (PBB)	0.1%	-
Polybrominated diphenyl ethers (PBDE)	0.1%	-
Additional substances introduced by 2015/863/EU:		
Bis(2-ethylhexyl) phthalate (DEHP)	0.1%	2019-07-19
Butyl benzyl phthalate (BBP)	0.1%	2019-07-19
Dibutyl phthalate (DBP)	0.1%	2019-07-19
Diisobutyl phthalate (DIBP)	0.1%	2019-07-19

European Directive 2015/863/EU has added four additional substances to RoHS Annex II. These new restrictions came into force 2019-07-19. However, the new substances have been known already from the REACH candidate list and our products of the main catalogue already comply with these requirements.

CE marking versus ROHS marking
Executive summary:

- A new obligation has been introduced with the RoHS II: Electrical and Electronical Equipment (EEE) falling under the scope of the RoHS II must be CE marked.
- European laws do not allow the use of the CE mark together with any other mark (e.g. “ROHS”) that attests the same conformity.
- Lapp changes the print legend of all affected cables. The “ROHS” mark will be removed.
- All products of the international main catalogue continue to comply with the requirements of the RoHS II.

Good to know:

The new CE marking requirement comes with transitional rules and different deadlines for the different equipment categories. Cables with nominal voltage < 250 V, which are not designed specifically for a certain application, usually belong to RoHS product category 11 “other EEE”. The deadline to apply the

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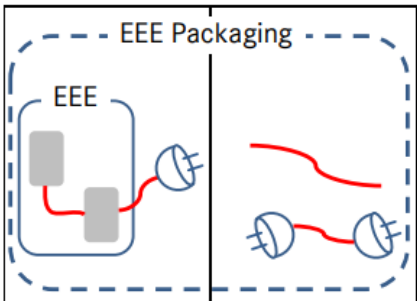
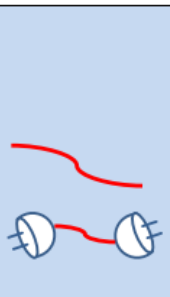
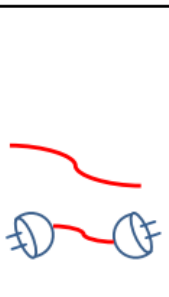
CE mark for category 11 products is 22 July 2019.

In detail: Cables may be in the scope of the RoHS II, but many cables are excluded from the scope:

- Voltage rating 250 V and more
- Cables specifically sold to be assembled into an EEE
- Cables specifically sold to be packaged and distributed together with an EEE
- Cables designed specifically for applications outside the scope (non-EEE)
- Fibre-optical cables
- Exceptions according Article 2.4 apply, e.g. large-scale stationary industrial tools, large-scale fixed installation, means of transport for persons or goods, photovoltaic panels.

	 Internal cables with rated voltage <1kV AC or <1.5kV DC	Rated voltage <250V and dedicated to specific EEE and marketed together with EEE	 Rated voltage <250V and dedicated to specific EEE and marketed individually	Rated voltage <250V and not dedicated to specific EEE	 Rated voltage >250V or optical cables
EU Declaration of Conformity (DOC) for the cable	NO	NO	YES	YES	NO
CE marking of the cable (or packaging, etc.)	NO	NO	YES	YES	NO
Due Date	Same as corresponding EEE category (category 1 to 10)	Same as corresponding EEE category (category 1 to 10)	Same as corresponding EEE category (category 1 to 10)	22 July 2019 (category 11)	-

Before the introduction of the RoHS II, it was common practice to mark products with all types of "ROHS" logos or other marks. Each manufacturer was allowed to use his individual mark to express conformity with the RoHS requirements. Lapp cables were often marked with "ROHS" in the print legend. With the RoHS II, this practice has been changed. European laws do not allow the co-existence of the CE mark and any other mark that attests the same conformity:

> 4. The CE marking shall be the only marking which attests the conformity of the product with the applicable requirements of the relevant Community harmonisation legislation providing for its affixing.

(EU Regulation 2008/756/EC, Article 30 "General principles of the CE marking")

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In order to follow the new legal requirements, the Lapp Group is currently in process of changing the print legend of all cables that fall under the scope of the RoHS II. The previous “ROHS” mark will be replaced by the CE mark. Until the deadline in 2019, it will be possible to have mixed stock of the same cables for a limited time: With "ROHS" print legend or with CE mark. Both versions are technically identical. There is no difference of both versions, other than the print legend.

Irrespective of the scope of the RoHS II Directive, all products in the main catalogue of the Lapp Group are in compliance with the RoHS II Directive 2011/65/EU and its amendments on the restriction of the use of certain hazardous substances in electrical and electronic equipment. These products do not contain any of the substances restricted by RoHS II and its amendment 2015/863/EU or exceed the maximum concentrations stipulated therein, except for the Annex III exemptions of this Directive.

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