

Stainless Steel and the European Union Restrictions on Hazardous Substances (RoHS) Directive

Reference Cold Rolled Stainless Steel grades 1.4301 and 1.4016 supplied in homogeneous condition for manufacture of pressed products:

DIRECTIVE 2011/65/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

updated on 11th July 2023 on the restriction of the use of hazardous substances in electrical and electronic equipment – hereinafter RoHS 2 Directive

Hexavalent Chromium Is Not Present in Stainless and Specialty Steels.

Stainless steels are iron-based alloys that contain a minimum of approximately 11% chromium by weight. It is this addition of chromium that gives stainless steel its unique corrosion resistant properties through the formation of an invisible and adherent chromium-rich oxide surface film.

The vast majority of chromium in stainless and other specialty steels is in the metallic/elemental form (zero valence state). A small amount of trivalent chromium (oxide) is formed on the surface of specialty steels and is crucial for protecting the alloy from corrosion. Hexavalent chromium, which is associated with certain adverse health effects, is not present in or on stainless or other specialty steels.

In addition, lead, mercury, cadmium, polybrominated biphenyl (PBB), and polybrominated diphenyl ether (PBDE) are not purposefully added in the stainless steel manufacturing process. Based on knowledge of raw materials, additives, process chemistry and available industry-wide data, stainless steel products do not contain measurable levels of mercury, cadmium, PBB, or PBDE (or hexavalent chromium, as noted above). Naturally occurring substances, such as lead and possibly cadmium, may be present at trace levels, due to impurities in raw materials. These trace levels are well below the maximum concentration thresholds specified in the EU RoHS Directives (0.1% for lead, hexavalent chromium, and mercury; 0.01% for cadmium).

Accordingly, Stainless and specialty steels are in conformance with the requirements of the European Union's legislation on waste electrical and electronic equipment ("WEEE"; Directive 2002/96/EC) and its companion directive on the restriction on hazardous substances used in EEE ("ROHS" – Directive 2002/95/EC; and "ROHS II" – Directive 2011/65/EU), as well as EU Directive 2000/53/EC on End-of-Life Vehicles, and the Japanese Green Procurement Initiative.

In the absence of evidence to the contrary, Stainless International Ltd shall presume Stainless Steel in the above grade and condition certified with CE marking, to comply with Directive RoHS 2011/65/EU. Stainless International Ltd believe therefore, that they have no other obligation under this legislation. Beyond this, it is for the further manufacturer to determine if they are satisfied that the Stainless Steel materials, they propose to use in their products are compliant for their process and purposes.

Andrew Holland, Managing Director
Stainless International Ltd

31st January 2026