

Lead metal vs EU REACH: Brief note to projects

The substance lead metal (CAS 7439-92-1) is severely restricted in the EU due to its hazard profile.

To strengthen the protection of workers, the European Commission (COM) has proposed a **Directive lowering of existing occupational and biological limit values for lead (and its compounds)**;¹ adoption of the Directive and subsequent national transpositions are not expected to be completed before 2025.

Lead was also included in the **EU REACH Candidate List** in June 2018, triggering certain reporting obligations for EU/EEA suppliers of articles containing lead above 0.1% weight by weight (REACH Article 33, WFD/SCIP notification).²

Importantly however, **lead is still allowed to be used in the production of space hardware today and in the foreseeable future** where there are no viable alternatives. The Recommendation of the European Chemicals Agency (ECHA) of 12 April 2023 for the inclusion of substances in Annex XIV to REACH (List of Substances subject to Authorisation), **which includes lead metal**,³ is non-binding for COM and does **not** imply any ban of lead use in the EU, even if followed by COM in the future. Such COM decision would also require a positive vote by the majority of EU Member States; in this regard, Germany's *Federal Institute for Occupational Safety and Health* has already expressed that they do not support the inclusion of lead in Annex XIV.⁴ It is thus expected that essential uses of lead without alternatives (e.g. tin/lead soldering, use in other alloys / mixtures) may legally continue in the EU space industry as long as necessary.

The future legal framework for continuing such uses under EU REACH, incl. the possibility of additional requirements (e.g. application for authorisation or restriction with derogations) is still undecided at this point; it may also depend on the outcome of the ongoing REACH Regulation Revision. A dedicated Space Sector Task Force (REACH **Lead Task Force (LTF)**) is closely monitoring the regulatory evolutions in this regard and develops input to support continued use; a joint **Lead-free Transition Working Group (LFTWG)** is looking into alternatives.

For remaining questions, please contact reach.officer@esa.int.

Version history:

- Initial version 1.0, 25 August 2022, ref. RL-MPTB-2022-08-25-Pb-REACH
- Current version 1.1, 21 June 2023, ref. RL-MPTB-2023-06-21-Pb-REACH: Added references to the Commission Proposal COM(2023) 71 final of 13.2.2023 regarding the lowering of worker protection limit values, the ECHA Annex XIV Recommendation of 12 April 2023 and the statement of Germany's *Federal Institute for Occupational Safety and Health* of 8 February 2023 opposing the inclusion of lead in Annex XIV.

¹ Commission Proposal for a Directive of the European Parliament and of the Council amending Council Directive 98/24/EC and Directive 2004/37/EC of the European Parliament and of the Council as regards the limit values for lead and its inorganic compounds and diisocyanates, COM(2023) 71 final, 13.2.2023, available [here](#);

² See <https://echa.europa.eu/scip>.

³ The ECHA Recommendation is available [here](#).

⁴ Minutes of the 81st Meeting of the ECHA Member State Committee dated 8 February 2023, p13 'DE statement on the inclusion of lead in Annex XIV', available [here](#).