



New limit for lead in consumer products

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Since 1 June, a new restriction under REACH for lead and lead compounds in many consumer products including children/baby products has been in effect. Lead in toys is already regulated in the Toy Safety Directive (TSD).

Background

Lead, among others, can be present as metallic lead, additive alloys (e.g. brass), pigment or simply as a contaminant.

It is known to have a particular effect on neuronal development. Small children aged 6-36 months are especially susceptible to these effects. Since children in this age group are most prone to putting things in their mouths, the restriction is therefore aimed at reducing the risk of young children being exposed to lead.

What are the restrictions?

After 1 June, the concentration of lead in a product/item or in an accessible part of a product/commodity must not exceed 0.05 weight percent (500 ppm).

The limit applies only if the product or the accessible portion of the product under normal or reasonably foreseeable conditions can be mouthed by children. A product or accessible part of a product which has at least one dimension (height, length, width) less than 5 cm is considered to be mouthed by children.

Products or their accessible parts on all dimensions larger than 5 cm are not considered to be mouthed by children and are not subject to limitation.

Other exceptions

The limitation mentions "normal or reasonably foreseeable conditions". This means that products that obviously must be kept out of reach of children are exempt. Examples are products that are obviously dangerous (e.g. because they are flammable), or products that will be mounted/installed at a height or location that makes them inaccessible to children.

There is also an exception for the concentration of lead greater than 0.05% by weight, as the product may be sold if, by special tests, it is shown that lead is not released by more than 0.05 mg/cm² per hour.

There is also a list of products that are exempt. It includes, for example, jewelry (which has a special regulation for lead), keys, padlocks, musical instruments, products/parts of brass which lead content is below 0.5%, button cell batteries, etc..

Toys exempt

Since the TSD already sets strict limits for lead in toys, the new REACH restriction does not apply to toys (that toys are not "double-regulated").

The new restriction is available here: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R0628&from=EN>An interpretative documents for the restriction is here:

https://echa.europa.eu/documents/10162/13563/lead_guideline_information_en.pdf

Note: "Article" is the legal term used in REACH as "product" is the term used in everyday speech.

About TIE

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