

Update as of 21 April 2026:

Oeko-Institut has confirmed the launch of Pack 29 on April 21, 2026. This package includes, among others, the assessment of the UV-relevant RoHS exemptions 4(a)-I and 4(f)-IV. Stakeholder consultation is planned for May 2026. The article will be soon updated accordingly to reflect this latest procedural development.

## Major Update RoHS-UV 2026

### RoHS exemption procedure for UV technologies: decision timeline shifts further back

March 2026 – Advanced UV for Life

#### The previously expected deadline of 24 February 2027 is losing steering effect

##### *Executive Summary*

- *The deadline of 24 February 2027 is becoming less relevant for mercury-containing UV technologies in categories 4(a)-I and 4(f)-IV.*
- *The decision-making process is being delayed. Consultation and scientific assessment have not yet begun.*
- *Short-term regulatory planning certainty remains in place, while long-term strategic uncertainty is increasing.*
- *A review of the application documents reveals differing regulatory strategies within the industry.*
- *Strategic decisions in the UV market will, for the time being, be shaped less by regulatory deadlines and more by technological and market developments.*

## Part 1 – Timeline shift and regulatory framework

A decision by the European Commission on RoHS exemptions **4(a)-I** and **4(f)-IV** for **mercury-containing UV lamp technologies** is likely to occur later than widely expected.

In August 2025, **applications for the extension and amendment of these exemptions** were submitted within the prescribed deadline. Receipt was confirmed by the European Commission on 22 August 2025. With the submission, the legal consequence set out in Article 5(5) of the **RoHS Directive** took effect: the existing exemptions remain valid until the Commission reaches a decision. As a result, the **expiry date of 24 February 2027** stated in the 20260315-001EN

directive text loses its practical relevance for the ongoing procedure. In simple terms, the exemptions will not automatically expire in February 2027.

In the current **Rolling Plan** of the European Commission, the previous expiry date for exemptions 4(a)-I and 4(f)-IV has **already been crossed out**.

The key question now is when a **political decision** can realistically be expected.

It is already becoming apparent that the envisaged procedural **timetable will not be met**. According to the sequence outlined by the EU, a **consultation phase** should have started already, followed by a scientific assessment. Under these conditions, a decision might still have been possible before the previously anticipated date. However, as of spring 2026, the consultation has not yet begun. The **actual progress** of the procedure is therefore becoming the decisive factor for its timing.

According to information from the **European Commission**, decisions on RoHS exemptions currently take around **18 to 24 months** from the date of application. Experience from the previous application cycle concerning the same exemptions shows, however, that procedures can take **significantly longer** in practice.

### RoHS exemptions in focus

**4(a)-I** UV lamps with predominantly ultraviolet emission and without phosphor coating. In practice, this includes, among others, **low-pressure UV lamps for water and air disinfection** as well as analytical applications.

**4(f)-IV** UV lamps emitting in the ultraviolet spectrum. In technical practice, this covers UV lamp technologies across different performance classes, commonly categorised as **low-, medium- and high-pressure lamps**. Applications include industrial processes, curing and disinfection.

*Note:*

*Time-limited RoHS exemptions allow the temporary use of otherwise restricted chemical substances if suitable alternatives are not yet sufficiently available from a technical or practical perspective. In addition to these time-limited exemptions, there are also general exclusions from the scope of the directive, for example for certain large-scale industrial installations. These exclusions are not the subject of this article.*

The actual start of the **scientific assessment** remains unclear. In some cases, it has been assumed that the assessment and consultation process for the current UV exemptions 4(a)-I and 4(f)-IV is already part of ongoing studies. Based on current information, the study package being conducted by the **Oeko-Institut** (“Pack 28”) relates exclusively to earlier applications. Industry experts confirmed in discussions that **no service provider** has so far been commissioned to carry out the scientific assessment of the current UV applications.

Institutional changes in the European regulatory framework may also influence the further timeline. Directive (EU) 2025/2456 provides that the scientific assessment of RoHS exemptions will in future be more closely linked to the **European Chemicals Agency (ECHA)**. As these new competence rules will only apply from August 2027, the ongoing UV applications are subject to a transitional situation. It is currently not known whether consultation and assessment will already be carried out by **ECHA** or whether – as in previous procedures – an **external contractor** will be appointed.

In addition, the evaluation of the exemptions concerned is **structurally complex**. UV technologies are widely used in professional and **infrastructural applications**, for example in water and air disinfection or in industrial processing and curing applications. Performance parameters and operating conditions are often defined on a project-specific basis; publicly comparable data are therefore only available to a limited extent.

All this suggests that a **political decision** on the UV-relevant RoHS exemptions will be taken significantly after the deadline of 24 February 2027.

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## Part 2 – A look at the applications

As part of its technical work, **Advanced UV for Life** was able to gain preliminary insight into extension and amendment applications that are not publicly available yet. In addition, discussions were held with several UV companies. This makes it possible to provide an **initial assessment** of the ongoing exemption procedure and the lines of argument represented within it.

Some applicants are pursuing an **extension-oriented approach** aimed at the general continuation of existing exemptions. This position assumes that in many applications UV technologies are integrated into **complex industrial and infrastructural systems** and that alternative solutions often cannot currently be regarded as functionally equivalent or compatible with existing installations. Central arguments relate to **system integration**, retrofit capability and long-term operational reliability.

Other applications seek **amendments** to existing exemptions or a stronger **differentiation between specific application areas**. From this perspective, it is argued that technological developments are progressing differently across market segments and that practical mercury-free – especially **UV-LED** based - **solutions are already available** in certain applications.

The **differing lines of argument** concern key assessment criteria under the RoHS Directive. Divergent views exist not only regarding individual technical parameters, but also with respect to the consideration of system and infrastructure interdependencies as well as retrofit aspects in existing plant structures. This is reflected, for example, in the fact that some stakeholders emphasize the **substitutability of individual UV lamps**, while others point out

that new installations are **designed differently from the outset**, thereby reducing the relevance of replacement considerations.

Against this background, **Advanced UV for Life** is currently working on a structured analysis of the arguments presented in the applications. The aim is to enable member companies to **better assess regulatory developments** in the context of their respective market and technology strategies.

Regardless of these differing positions, the timeline of the exemption procedure remains open.

## Consequences

As a decision on RoHS exemptions for UV technologies is unlikely to be taken at the previously widely expected time, the current **legal situation** will remain unchanged for the time being. Short-term regulatory disruptions are therefore not expected at present.

Even without an imminent regulatory turning point, **investment, technology and product decisions** in the UV sector still need to be made.

As long as a regulatory decision is pending, actual **technological developments** in UV applications as well as **market and competitive dynamics** will continue to play a decisive role in strategic business decisions.

## Conclusion

Because a political decision on **RoHS exemptions** for mercury-containing UV technologies is expected only well after 24 February 2027, this previously anticipated deadline is losing its strategic steering effect for the UV market.

For companies and users, this means a **phase of extended regulatory stability** in which the current legal framework will initially continue to apply. At the same time, **medium- and long-term planning uncertainty** arises, as both the timing and the substance of a future regulatory decision remain open.

Precisely because short-term regulatory clarification is unlikely, **technological developments** and **real-world market and application experience** are once again moving to the centre of strategic decision-making in the UV sector. They thus become key reference points for investment and technology pathways.

### *Disclaimer*

*This article is intended solely for general information for the UV industry and does not constitute legal or regulatory advice. Only the applicable legal framework and its binding interpretation by the competent institutions are authoritative. Despite careful research, no guarantee can be given as to the completeness, accuracy or timeliness of the information presented. The assessments described are based on the current status of the exemption.*