

# GRUPPO LUCEFIN

The Lucefin Group  
includes  
the following  
companies:

TRAFILIX SpA

TRAFIL CZECH sro

ACCIAI BRIANZA SpA

COMET ACCIAI Srl

COSMO ACCIAI Srl

NUOVA BASSANI Srl

SIDERMARCA Srl

KSM STAHL GmbH

## DIRECTIVE EC 95/2002 ROHS AS AMENDED 12/11/2025

### UPDATE:

Three delegated directives were published in the Official Journal of the European Union on November 21, 2025, amending Annex III to Directive 2011/65/EU on the restriction of the use of hazardous substances in electrical and electronic equipment, specifying the new terms as set out below.

The Directive 2002/95/EC and subsequent amendments and addendum, 2011/65/EU and 2015/863/EU, set restrictions on the use of hazardous substances in electrical and electronic equipment (EEE) by defining concentration limits for the following substances in homogeneous materials:

- lead (0,1%)
- mercury (0,1%)
- cadmium (0,01%)
- hexavalent chromium (0,1%)
- poly-brominated biphenyls (PBBP) (0,1%)
- poly-brominated di-phenyl ethers (PBDE) (0,1%)
- bis(2-ethylhexyl) phthalate (DEHP) (0,1 %)
- butyl benzyl phthalate (BBP) (0,1 %)
- dibutyl phthalate (DBP) (0,1 %)
- diisobutyl phthalate (DIBP) (0,1 %)

The products sold by the Lucefin Group companies (bright finished steel bars, hot rolled bars, forged bars, steel tubes) can be considered homogeneous, whose definition given by the article 3 of the Directive RoHS-II is the following: "Homogeneous material" is a material with a uniform composition or a material obtained thanks to the combination of more than one component which cannot be split in different materials through mechanical actions like unscrewing, cutting, crushing, grinding and abrasive processes. The steels processed and distributed by Lucefin Group companies comply with the limits set by the regulations except for some steel grades in which the concentration of Lead exceeds the set limit.

Commission Delegated Directive (EU) 2025/2364 of September 8, 2025 amends Directive 2011/65/EU of the European Parliament and of the Council as regards the exemption for lead as an alloying element in steel, aluminum, and copper. Specifically, the regulation amends exemptions 6(a), 6(b), and 6(c), which cover the use of lead in concentrations greater than 0.1% as an alloying element in metal alloys, extending their duration.

		Deadline
6a)	Lead as an alloying element in steel intended for mechanical processing and galvanized steel containing up to 0.35% lead by weight.	11 December 2026
6a)-I	Lead as an alloying element in steel intended for mechanical processing containing up to 0.35% lead by weight (*)	30 June 2027 for all categories
6a)-II	Lead as an alloying element in hot-dip galvanized steel components for batches containing up to 0.2% lead by weight (*)	

(\*) The exemption does not apply to Electrical and Electronic Equipment (EEE) intended for the general public if the equipment or its accessible parts can be placed in the mouth by children under normal or foreseeable conditions of use.

Legal Representative pro tempore