EU REACH SVHC (253 Substances) & RoHS Flow-Downs for WA Space Firms

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Verification & Authority Baseline: EU REACH (EC 1907/2006, 253 SVHCs as of Feb 2026) and RoHS (2011/65/EU) are binding EU laws for articles/EEE placed on the EU market. On US-only WA suppliers, they apply solely via prime contractual flow-down (e.g., for European launch/satellite customers or global BOMs).



EU Rule	Current 2026 Threshold / Scope	US Supplier Binding Trigger
EU REACH Art. 33 (SVHC)	253 SVHCs (Feb 2026); >0.1% w/w per article	EU importer/market placement or Prime PO flow-down
EU RoHS (2011/65/EU)	10 restricted substances (Pb, Cd, Cr6+, Hg, phthalates)	EU EEE placement or Prime PO; space/defense exemptions
GHG / Scope 3	Not covered by REACH or RoHS	None (FAR 2021-015 withdrawn Jan 2025)

Who Issues This Ask, Authority, and Binding Status

EU REACH (`Regulation (EC) No 1907/2006`) and EU RoHS (`Directive 2011/65/EU`) flow down to Washington space suppliers through primes selling satellites, ground terminals, or components into Europe, or maintaining a single global Bill of Materials.

Legally, EU REACH and RoHS bind **only** entities placing articles or electrical/electronic equipment (EEE) on the **European Union / EEA market**. For a WA supplier shipping exclusively to a US prime, REACH/RoHS compliance is **not US law**—it is **contractually binding only if written into the prime's Purchase Order or drawing notes**. Note also that RoHS includes specific exemptions for military/aerospace reliability (e.g., tin-lead solder for high-reliability space flight hardware), whereas REACH Article 33 communication applies whenever any of the **253 SVHCs** (as of the February 4, 2026 ECHA update) exceeds 0.1% weight by weight.

Evidence Required & Small-Supplier Effort Cost

Suppliers provide a signed **REACH Article 33 Declaration** (listing any SVHC >0.1% w/w by article, or confirming zero SVHCs above threshold) and a **RoHS Certificate of Compliance** (citing applicable exemptions such as Pb solder if used in flight-critical assemblies), or submit via IPC-1754 Class E/F.

Internal lab testing or BOM-audit costs are **not in our data**; most small WA shops rely on upstream distributor/mill Certificates of Analysis and SDSs rather than destructive chemical testing.

WA Space Cluster Segments & Companies Affected

REACH/RoHS asks land most often on Ground Systems & SATCOM (commercial user terminals shipped globally, e.g., Kymeta), Satellite Manufacturing, and Components & Suppliers using chromate finishes or leaded solder (Xanfab, Crane Aerospace & Electronics).

Verified Primary Sources & Internal Bridges

• EUR-Lex — EU REACH Regulation (EC) No 1907/2006: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02006R1907-20240606

• EUR-Lex — EU RoHS Directive 2011/65/EU: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32011L0065