

## China RoHS

**Effective Date: 1 August 2025**

### **Understanding GB 26572-2025: China's Latest Mandatory RoHS Standard**

Coherent products supplied by Coherent conform to the applicable requirements of China's Requirements for the Restriction of Hazardous Substances in Electrical and Electronic Products (GB 26572-2025) (commonly referred to as China RoHS) and associated standards.

The mandatory RoHS standard GB 26572-2025 was issued on 1 August 2025 to enhance the management of hazardous substances in electrical and electronic products (EEPs) and provide a solid framework for stricter enforcement.

### **Product Classification**

The chart below highlights the scope of covered product categories. Coherent products are under Category II requirements.

Category of Electrical & Electronic Products	Classification of Electrical & Electronic Products	Compliance Requirements
Category I	Products included in the <i>Catalogue For Compliance Management Of Restricted Use Of Hazardous Substances In Electrical And Electronic Products</i>	Must comply with: 1. Hazardous substance limits (10 substances), and 2. Mandatory labeling (including digital formats)
Category II	Products <b>not</b> included in the <i>Catalogue For Compliance Management Of Restricted Use Of Hazardous Substances In Electrical And Electronic Products</i>	1. Encouraged to comply with substance limits; 2. Must comply with labeling requirements

### **Expanded Substance Restrictions**

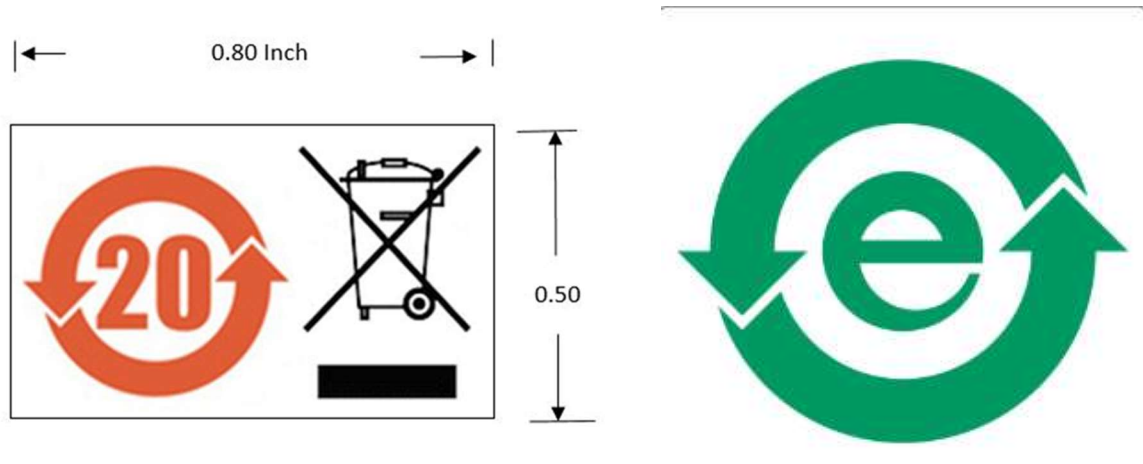
Restricted Substances & Limits: The list of restricted substances has increased from 6 to 10, now including four phthalates: DBP, DIBP, BBP, and DEHP.

- Lead (Pb) ≤ 0.1%
- Mercury (Hg) ≤ 0.1%
- Cadmium (Cd) ≤ 0.01%
- Hexavalent Chromium (Cr(VI)) ≤ 0.1%
- Polybrominated Biphenyls (PBB) ≤ 0.1%
- Polybrominated Diphenyl Ethers (PBDE) ≤ 0.1%

- Dibutyl phthalate (DBP)  $\leq 0.1\%$
- Diisobutyl phthalate (DIBP)  $\leq 0.1\%$
- Butyl benzyl phthalate (BBP)  $\leq 0.1\%$
- Bis(2-ethylhexyl) phthalate (DEHP)  $\leq 0.1\%$

### **Mandatory Labeling**

Labeling requirements from SJ/T 11364-2024 are now compulsory. On labeling, the guidance specifies that the EFUP (environmentally-friendly use period) mark should generally be placed directly on a visible area of the product. If this is not feasible due to size, shape, surface material, or functional limitations, the mark must instead appear in the “Product Description.” Please note, it is now acceptable to provide this mark in digital formats (e.g., QR codes) or may be provided via web-based disclosures.



**Figure 1:** Sample EFUP logos typical of Coherent products.

Please note, EFUP markings will be retained on the outermost product packaging to mitigate potential customs inquiries or clearance delays. These logos will be clearly visible on the external shipping cartons containing Coherent products, ensuring alignment with applicable import documentation and regulatory expectations.

The information table is also typically provided in the “Product Description,” which may take various forms, such as printed manuals, electronic instructions, CDs/DVDs, packaging, built-in system software, or the company’s website.

产品中有害物质的名称及含有信息表 Hazardous Substances Contained in the Product										
部件名称 Component Name	有害物质 Hazardous Substances									
	铅 (Pb)	汞 (Hg)	镉 (Cd)	六价铬 (Cr(VI))	多溴联苯 (PBBs)	多溴二苯醚 (PBDEs)	邻苯二甲酸二正丁酯 (DBP)	邻苯二甲酸二异丁酯 (DIBP)	邻苯二甲酸丁苯酯 (BBP)	邻苯二甲酸二(2-乙基)己酯 (DEHP)

注 1：O：表示该有害物质在该部件所有均质材料中的含量均不超出电器电子产品有害物质限制使用国家标准要求。  
Indicates that the said hazardous substance contained in all homogeneous materials for the part does not exceed the limits given in the national standard regarding restricted use of hazardous substances in electrical and electronic products.

X：表示该有害物质至少在该部件的某一均质材料中含量超出电器电子产品有害物质限制使用国家标准要求。  
Indicates that the said hazardous substance contained in at least one of the homogeneous materials used for this part exceeds the limits given in the national standard regarding restricted use of hazardous substances in electrical and electronic product.

注 2：以上未列出的部件，表明其有害物质含量均不超出电器电子产品有害物质限制使用国家标准要求。  
Those components not listed above indicate that the content of all hazardous substances contained therein does not exceed the limits given in the national standard regarding restricted use of hazardous substances in electrical and electronic products.

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**Figure 2: Sample Hazardous Substance Table**

Please note, the table and EFUP labels listed above are representative samples of a generic Coherent China RoHS Hazardous Substances Table and EFUP logo in accordance with SJ/T 11364-2024. If you would like a table or logo for your specific product or product lines, please send an email to: [Productstewardship@Coherent.com](mailto:Productstewardship@Coherent.com) and it will be sent to you directly.

**Testing Methods for Hazardous Substances**

The guidance further explains how to assess hazardous substance content in EEPs by following the GB/T 39560 standard series. GB/T 39560 is a Chinese national standard series that defines testing methods for hazardous substances in electrical and electronic products. It replaced the older GB/T 26125 standard as of March 1, 2024, aligning China RoHS testing with the international IEC 62321 series used in EU RoHS compliance.

## **Transition Period**

Suppliers placing EEPs on the Chinese market should note the “2+1” implementation plan set out in the guidance:

- GB 26572-2025 takes effect on 1 August 2027, following a two-year transition period from publication.
- For products manufactured or imported on or before 1 August 2027, compliance with GB 26572-2025 is required starting 1 August 2028, after a one-year grace period for clearing existing inventory.

Coherent continues to monitor China RoHS regulatory developments with the aim of ensuring in-scope product conformity with these new requirements. Coherent is committed to maintaining ongoing compliance, including with any amendments or superseding regulations.