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2025 Update on EU REACH and POPs Restrictions: Key Insights

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01. About The Author

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Dieudonné Ymedji is a Senior Regulatory Compliance Specialist with the Global Regulatory Compliance team since 2007.

He oversees and manages regulatory developments on a number of topics including EU REACH, Chemicals in Products, Chemicals Management, GHS and Nanotechnology.

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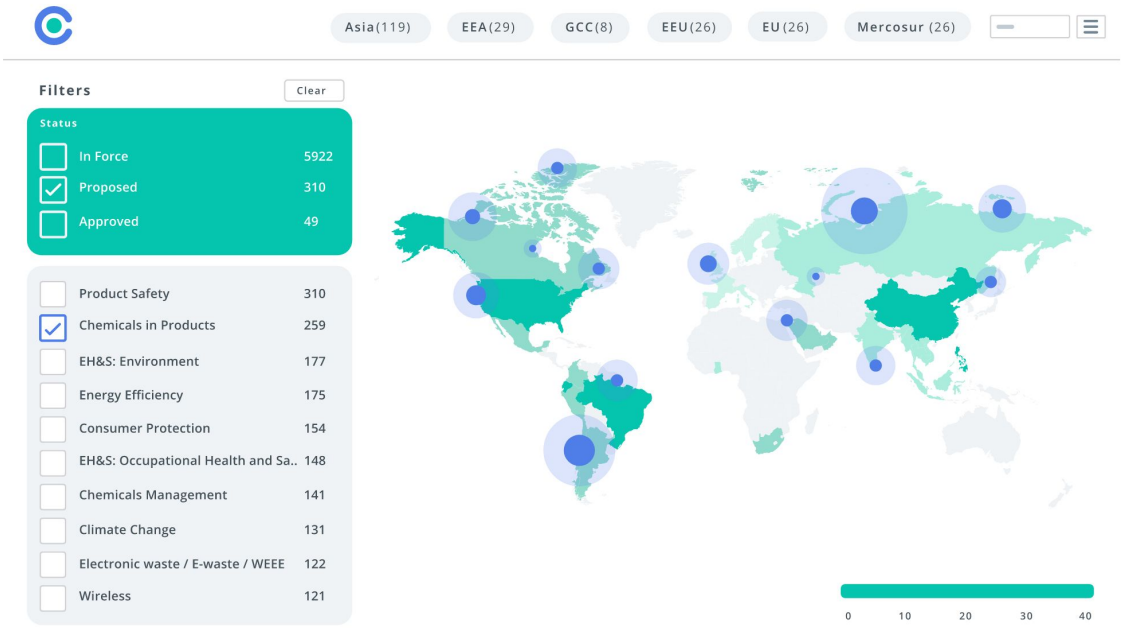

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03. Introduction

In 2025, the regulatory landscape for hazardous substances continues to evolve, building on past progress.

This year introduces new and proposed restrictions under the EU regulations governing consumer products, focusing on consumer safety.

These updates intend to foster a toxic-free environment by removing harmful substances from products like electrical equipment, textiles, and food packaging.

This whitepaper outlines the recent modifications to the EU REACH Candidate List and Annex XVII, which detail restricted substances. It also discusses revisions to the Persistent Organic Pollutants (POPs) Regulation 2019/1021, which addresses the risks associated with long-lasting organic chemicals that threaten both human health and the environment.

04. REACH SVHC Updates

Two updates of the Candidate List of Substances of Very High Concern for Authorisation (SVHC) were carried out by the European Chemicals Agency (ECHA) on **21 January and 25 June 2025** to add eight new substances to the 242 already listed.

The new chemicals, mainly found in lubricants, the manufacture of electrical, electronic and optical equipment, machinery and vehicles, the formulation of cosmetics, personal/health care products, pharmaceuticals, polymers, adhesives, sealants and coatings, are:

- *6-[(C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl] hexanoic acid, CAS no. 2156592-54-8, EC no. 701-118-1*
- *O,O,O-triphenyl phosphorothioate, CAS no. 597-82-0, EC no. 209-909-9*
- *Octamethyltrisiloxane, CAS no. 107-51-7, EC no. 203-497-4*
- *Perfluamine, CAS no. 338-83-0, EC no. 206-420-2*
- *Reaction mixture of triphenylthiophosphate and tertiary butylated phenyl derivatives - CAS no. 192268-65-8, EC no. 421-820-9*
- *1,1,1,3,5,5,5-heptamethyl-3-[(trimethylsilyl)oxy]trisiloxane, CAS no. 17928-28-8, EC no. 241-867-7*
- *Decamethyltetrasiloxane, CAS no. 141-62-8, EC no. 205-491-7*
- *Tetra(sodium/potassium)7-[(E)-{2-acetamido-4-[(E)-(4-{[4-chloro-6-({2-[(4-fluoro-6-{[4-(vinylsulfonyl)phenyl]amino}-1,3,5-triazine-2-yl)amino]propyl}amino)-1,3,5-triazine-2-yl]amino}-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate, EC no. 466-490-7.*

As a result of all these inclusions to the Candidate List, suppliers of articles that contain > 0.1% w/w of any of these substances must inform recipients of the articles about the presence of the SVHC and how to use it safely or update the safety data sheet they provide to their customers.

They shall also notify ECHA within six months of the date the substance has been included in the list. Since **January 5, 2021**, under the Waste Framework Directive, they must also submit information to ECHA via the SVHC in Articles or in complex objects or products (SCIP database), including information on articles containing any SVHC. It is worth noting that the future of the SCIP database is currently being reviewed.

As part of its initiative to simplify administrative burdens in environmental legislation, including areas such as the circular economy, industrial emissions, and waste management, the EU Commission has suggested discontinuing the SCIP database in a "Call for Evidence" launched on 22 July 2025.

This initiative has gained considerable support from the industry, particularly SMEs, which often find the reporting process cumbersome and redundant due to overlapping requirements under the REACH regulation.

The call for evidence remained open for stakeholder feedback until September 10, and a legislative proposal is anticipated to be introduced in the fourth quarter of 2025.

Besides the recent additions, ECHA initiated a public consultation on 01 September 2025 for a further update of the Candidate List with three potential SVHC. These substances, commonly used in formulation and polymer processing and in coatings and cleaning agents, are:

- *n-Hexane (EC 203-777-6)*
- *4,4'-methylenediphenol (BPF, Bisphenol F) (EC 210-658-2), and*
- *4,4'-[2,2,2-trifluoro-1-(trifluoromethyl)ethylidene]diphenol and its salts.*

Stakeholders have until 16 October 2025 to provide input on the proposal. Based on the comments received, ECHA's Member State Committee may need to decide by the end of December 2025 or in January 2026 whether to include these substances in the Candidate List. A unanimous decision will result in an increase of SVHC for eventual inclusion in the Authorisation list from **250** to **253.**

05. REACH Annex XVII Updates

REACH Annex XVII is regularly revised through amendments that can introduce new restrictions, alter or entirely remove existing ones, to ensure the REACH regulation remains aligned with its primary goal of providing a high level of protection of human health and the environment against harmful substances.

Currently, there are 82 entries in REACH Annex XVII, each specifying restrictions to protect consumers and the environment. Producers, importers, suppliers, and distributors of consumer products in the EU market must carefully navigate these entries to ensure compliance with the outlined restrictions.

In 2025, four significant changes occurred: two existing entries were revised, and three new ones were added, reflecting continued efforts to enhance product safety and sustainability. Furthermore, two proposals to modify an existing entry and to introduce an additional one were also initiated.

5.1 Restriction on Polycyclic Aromatic Hydrocarbons (PAHs) in Clay Targets for Shooting

To address the risks associated with clay targets with PAH-containing binders produced or imported in the EU, Regulation (EU) 2025/660 amending existing entry 50 in Annex XVII was published by the European Commission on 1 April 2025.

PAHs are organic compounds, including naphthalene, anthracene, phenanthrene, and pyrene, that are classified under REACH as carcinogenic, mutagenic, and harmful to the reproductive system. Since December 27, 2015, the use of eight indicative PAHs has been restricted in various products. These include sports equipment like bicycles, golf clubs, household utensils, walking frames, tools for domestic use, clothing, footwear, gloves, sportswear, watch straps, wristbands, masks, toys and childcare articles. This restriction applies to items that contain rubber or plastic components and are in direct or repeated contact with the skin or oral cavity under normal or reasonably foreseeable conditions.

The amendment established by Regulation (EU) 2025/660 prohibits, starting from 22 April 2026, the marketing and use of clay targets for sport shooters and small game hunters if they contain more than 50 mg/kg (0.005% by dry weight) of the total sum of all 18 PAHs listed in the regulation's annex. To prevent supply chain disruptions, clay targets containing up to 1% of PAHs by dry weight may still be produced or used until this date.

5.2. Inclusion of DMAC and NEP to Annex XVII

On June 3, 2025, the European Commission released Regulation 2025/1090, amending Annex XVII of Regulation (EC) 1907/2006. This amendment adds two new restriction entries, 80 and 81, for N,N-dimethylacetamide (**DMAC**) and 1-ethylpyrrolidin-2-one (**NEP**).

DMAC is commonly used as a solvent or processing agent in various sectors, including the production of textile fibres, medical membranes, agrichemicals, electrical wire insulation, and pharmaceuticals. In contrast, NEP is utilised as a solvent in specialised coatings and as a cleaning agent in the manufacture of optical lenses.

The new regulation is designed to protect workers from harmful chemical exposure. Starting on **23 December 2026**, the manufacture and sale of DMAC and NEP in concentrations of 0.3% or higher will be prohibited in the EU. Manufacturers will need to update safety reports and comply with the Derived No-Effect Levels (DNELs) to continue using these substances.

The DNELs for DMAC are set at 13 mg/m³ for long-term inhalation exposure and 1.8 mg/kg of body weight per day for long-term dermal exposure. For NEP, the DNELs are established at 4.0 mg/m³ for long-term inhalation and 2.4 mg/kg of body weight per day for long-term dermal exposure.

The changes became effective on **23 June 2025** and will apply from **23 June 2029** for the marketing and use of DMAC as a solvent in the production of man-made fibres.

5.3. Annex XVII Update with New Carcinogenic, Mutagenic or Toxic to Reproduction (CMR) Substances

On August 8, 2025, the European Commission adopted Regulation (EU) 2025/1731, which amends Entries 28 to 30 of Annex XVII of the REACH regulation. This regulation prohibits the marketing and use of substances classified as CMR substances in category 1A or 1B, as outlined in Part 3 of Annex VI of the CLP Regulation.

In line with the updated classification of CMR substances under the CLP, as amended by Regulation (EU) 2024/197, the amendment revises Annex XVII appendices 2, 4, and 6 by adding 16 new CMR substances. This list includes diuron (ISO), the flame retardant tetrabromobisphenol A (TBBPA), bisphenol AF (BPAF), and two dibutyltin compounds.

Furthermore, in accordance with the Fuel Quality Directive (98/70/EC), which does not restrict cumene in motor fuels supplied to consumers or non-professional drivers, this amendment introduces a derogation from the restrictions outlined in entries 28, 29, and 30 of Annex XVII for **Cumene (CAS No 98-82-8, EC No 202-704-5)**. This derogation specifically applies to certain types of aviation fuels, such as kerosene and aviation gasoline, used in small aircraft operated by non-professional pilots. Without this derogation, fuel supplies for non-commercial aviation could have been disrupted, despite the low exposure risks and the existing technical handling safeguards in place.

Since **September 1, 2025**, these substances, widely used in industries including pesticides, coating and automotive manufacturing, are restricted from sale to the general public in standalone forms or mixtures if their concentrations meet or exceed the specific limits set by the CLP regulation.

5.4. General Restriction on the Use of PFAS in Firefighting Foams (FFF)

In line with the EU's Chemicals Strategy for Sustainability, which aims to protect human health and the environment, promote innovation for safe chemicals, and facilitate a transition to safer, sustainable alternatives, the European Commission published Regulation (EU) 2025/1988 on October 3, 2025. This regulatory initiative represents the first of its kind in the EU, laying the groundwork for broader restrictions on PFAS that are currently being developed.

The amendment introduces a new entry (82) to REACH Annex XVII to ban all PFAS as defined by the OECD criteria (i.e, substances containing a fully fluorinated methyl ($-CF_3$) or methylene ($-CF_2-$) carbon atom without attached hydrogen or halogen atoms) in FFF. It sets a strict limit of **≥1 mg/l** PFAS in FFF, effective from **23 October 2030**, with transition periods varying from 12 months to 10 years, depending on the specific use case.

Specifically, the sale of portable fire extinguishers containing PFAS will be restricted starting **April 23, 2026**. Additionally, beginning October 23, 2026, any FFF with a concentration equal to or greater than 1 mg/L of the total sum of all PFAS must include the following wording on the label: "*WARNING: Contains per- and polyfluoroalkyl substances (PFAS) with a concentration equal to or greater than 1 mg/L for the sum of all PFAS.*"

The use of PFAS extinguishers for training, testing, and by municipal fire services will be limited starting **April 23, 2027**, and will be prohibited in portable fire extinguishers after **December 31, 2030**.

For high-risk industrial facilities covered by the Seveso III Directive (2012/18/EU), such as offshore oil and gas, chemical, and petrochemical industries, existing non-compliant extinguishers may still be used until **October 23, 2035**, but only under strict conditions.

During these grace periods, operators are required to implement management plans to minimise PFAS releases into the environment and ensure proper treatment and disposal of waste, typically through incineration at temperatures exceeding 1100 °C. Furthermore, any equipment that has contained PFAS foams must be thoroughly cleaned before being refilled with fluorine-free alternatives.

06. Upcoming Changes to Annex XVII

6.1. Proposed Restriction on 2,4-Dinitrotoluene (2,4-DNT) under REACH

On June 3, 2025, the EU Commission proposed a new entry to Annex XVII to restrict 2,4-Dinitrotoluene (2,4-DNT) (CAS No. 121-14-2).

2,4-DNT is classified as a Category 1B carcinogen under the CLP Regulation and is listed as an SVHC. It is widely used in various applications, including automotive airbags, seat-belt pre-tensioners, explosives, plastic industry sample bottles, electronic devices, and polyurethane foam production.

The proposal prohibits the placing on the market or the use of 2,4-DNT as a substance in articles for professional users or the general public, in a concentration equal to or greater than 0.1 % by weight. This means any products meeting or exceeding this threshold will fall under the new regulations.

Specific exemptions are outlined in the proposal for FCM, pyrotechnic articles, equipment for military use, ammunition for police, medical devices, and toys, which will not be subjected to these restrictions.

Conversely, motor vehicles, spare parts, and certain automotive applications will be granted a transitional period of **36 months**. This period is intended to give manufacturers, suppliers, and relevant stakeholders sufficient time to adapt their operations and comply with the new rules.

Once adopted, the restrictions are expected to apply **12 months** after the proposal's official entry into effect. The EU Commission anticipates finalising adoption by the **end of 2025**. To prepare for these significant changes, sectors impacted by this regulatory shift are strongly encouraged to start their preparation efforts as soon as possible. This proactive approach will facilitate a smooth transition, ensuring compliance with the upcoming regulations and protecting their operations and market position.

6.2. Clarification of Derogations to SPMs Restrictions under Annex XVII, Entry 78

On 17 September 2025, the EU Commission notified the WTO of plans to revise the existing Annex XVII, Entry 78 of Regulation (EU) 2023/2055, which restricts synthetic polymer microparticles (SPMs) in various products from 17 October 2025.

This initiative follows input from Member States and stakeholders, who highlighted that the current wording of Entry 78 does not adequately reflect the regulators' intent to exempt all medicinal products for human and veterinary use, as well as SPMs used in product and process-oriented research and development (PPORD), regardless of the location of the PPORD.

To address these concerns and protect the legitimate interests of economic operators who may have relied upon the intention communicated in the adoption process of Regulation (EU) 2023/2055, the proposal provides explicit exemptions. Effective retroactively from October 17, 2023, these derogations will allow the marketing of SPMs used in PPORD and medicinal products, including those for clinical trials.

Moreover, the proposal clarifies Paragraph 5, point (c) of Entry 78 by stipulating that the derogation from the prohibition on placing SPMs on the market, where the risk from releases is expected to be minimised because the microparticles are permanently enclosed in a solid matrix during end use, will only apply to cases where the end use is anticipated to last for one year or longer.

The formal adoption of this revised proposal is projected to occur before the end of 2025, with implementation set to take effect 20 days following its publication in the Official Journal of the European Union.

6.3. Update on the EU-wide PFAS Restriction Proposal

On 20 August 2025, the European Chemicals Agency (ECHA) released an updated version of the proposal to restrict PFAS under the EU REACH. The revised proposal incorporates over 5,600 stakeholder comments and reflects new scientific evidence gathered since the initial submission in February 2023.

The update includes assessments for eight additional sectors, such as printing, sealing, and machinery applications, which will serve as the basis for ECHA's scientific committees' opinions RAC and SEAC.

The revised proposal also details the conditions under which PFAS can continue to be used in specific applications, provided that the associated risks are effectively managed, as well as proposed enforceable threshold standards above which manufacturing, use, and placing on the market are prohibited:

- 25 ppb for individual non-polymeric PFASs,
- 250 ppb for sum of non-polymeric PFASs,
- 50 ppm for total fluorine (including polymeric PFASs).

Most importantly, in addition to a full ban restriction option 1 (RO1) or a ban with time-limited derogations for specific applications (RO2), the revised proposal also includes a third alternative restriction option (RO3) submitted by the five member states' dossier submitters. This third option proposes allowing continued use under strict conditions for specific applications, such as sealing and machinery uses, where PFAS emission risks can be minimised and effectively controlled.

In a later announcement on 27 August 2025, ECHA outlined its plans to hold a public consultation in March 2026 on the proposal. This crucial step will focus on the socio-economic impacts of PFAS and alternatives, incorporating input from stakeholders that could potentially influence future regulatory exemptions, timelines, and feasibility.

Other key dates to keep in mind include an ECHA online information session scheduled for 30 October 2025, which aims to clarify stakeholders' expectations. The final opinion from the Socio-economic Analysis Committee (SEAC) is anticipated by the end of 2026.

07. Changes to POPs Regulation

The recast EU POPs regulation 2019/1021 aims to protect human health and the environment by eliminating or restricting the production and use of POPs, as defined in the Stockholm Convention. Substances listed in its Annex I are prohibited from production, manufacturing, placing on the market, and use in articles.

Over the course of this year, the EU Commission has published four separate regulatory measures amending and broadening the scope of certain POP substances included in Annex I. These amendments reflect the Commission's commitment to continuously update and refine its regulatory framework to address emerging scientific evidence better and enhance public safety regarding POPs substances.

Each regulation provides specific details about the newly identified substances, the reasoning behind their inclusion, and the timelines for compliance, ensuring that the regulation remains effective in mitigating the risks associated with POPs.

7.1. New PFOs Unintentional Trace Contaminant (UTC) Limits

Regulation (EU) 2025/718, which came into effect on 17 July 2025, amends Annex I of the EU POPs Regulation to introduce tighter controls on perfluorooctane sulfonic acid (PFOS) and its derivatives.

The amendment addresses unintentional trace contaminants (UTCs) to aligns with the significantly lower limit values already established for similar substances such as PFOA, C9-C14 PFCA, PFHxS, and PFHxA. It updates the previously outdated limits for UTC and removes certain specific PFOS exemptions listed in Annex I.

The term "derivatives" is replaced with "related compounds" to align with the terminology used for PFOA. Furthermore, the amendment updates the previously outdated limits for UTC and removes certain specific PFOS exemptions listed in Annex I.

Consistent with the existing permissible limits for PFOA trace contaminants in substances, mixtures, and articles, the amendment introduces lower UTC thresholds, effective from 3 December 2025, as follows:

- PFOS-related compounds: 1 mg/kg (0.0001% by weight)
- PFOS or any of its salts: 0.025 mg/kg (0.0025% by weight).

The new, lower UTC limits will lead to stricter controls over the presence of PFOS in various industries. Companies must carefully review their supply chains to ensure that PFOS levels remain below the newly defined thresholds.

Finally, the amendment removes a previous specific exemption that allowed the use of PFOS as a mist suppressant in non-decorative hard chromium plating, now that suitable alternatives are available.

7.2. Extended Derogations for FFF and New UTC Limit for PFOA

On 14 July 2025, the European Commission published Regulation (EU) 2025/1399 to amend the current entry in Annex I of the POPs Regulation, which imposes restrictions on perfluorooctanoic acid (PFOA), its salts, and related compounds.

This regulation postpones the ban on PFOA in FFF used for liquid fuel vapour suppression and Class B liquid fuel fires, which are already installed in mobile and fixed systems. The exemption period now extends from **4 July 2025** to **3 December 2025**, the latest date allowed under the current five-year exemption in the Stockholm Convention.

Additionally, the amendment allows for the continued use of articles containing PFOA that were in use before the exemption expired. It also establishes new maximum allowable concentrations (UTC limits) for PFOA, its salts, and related compounds in FFF:

- A UTC limit of ≤ 1 mg/kg for PFOA for PFOA or its salts and 10 mg/kg for any individual or combination of PFOA-related compounds in FFF already installed in systems is set until **August 3, 2028**.

- A UTC limit of ≤ 10 mg/kg for the total sum of PFOA, its salts, and PFOA-related compounds as UTC in fluorine-free FFF derived from firefighting equipment that has been cleaned according to the best available techniques.

Finally, the amendment deletes the Commission's requirement to review UTC limits for PFOA in medical devices and transported isolated intermediates. For clarity, the term "*firefighting foam*" is defined to include a broad range of mixtures used in fire suppression, covering both concentrated formulations and ready-to-use solutions.

7.3. Listing of UV-328 to Annex I

Commission Delegated Regulation (EU) 2025/843, published on 15 July 2025, includes UV-328 (CAS RN 25973-55-1) in Annex I to align with the Stockholm Convention Decision, SC-11/11, 2023.

UV-328 is a synthetic ultraviolet (UV) absorber that belongs to the phenolic benzotriazole (BZT) group, known for being highly persistent, bioaccumulative, and toxic. As an SVHC, UV-328 is regulated under REACH Annex XIV and requires authorisation for use. It is commonly used to prevent degradation and discolouration in various materials, including plastics, paints, coatings, adhesives, and inks, as well as other industrial and consumer products.

The new regulation prohibits the manufacture, use, and sale of UV-328 in substances, mixtures, and products. However, there is an exemption for UV-328 that is present as an unintentional trace contaminant, provided the concentrations remain below the specified thresholds:

- 100 mg/kg (0.01%) from the regulations effective date on August 4, 2025
- 10 mg/kg (0.001%) starting August 4, 2027
- 1 mg/kg (0.0001%) beginning August 4, 2029

Temporary exemptions are granted to allow industries time to transition to safer alternatives. Until 4 August 2030, the use of UV-328 in motor vehicles, blood collection tubes, polarisers, photographic paper, and aircraft is permitted. For specific applications and spare parts, exemptions are valid until 2043 or until the end of their service life.

From now on, companies must plan for this transition, invest in safer alternatives, and comply with the new regulations to avoid legal penalties and reputational damage.

7.4. Listing of Dechlorane Plus to Annex I

On 29 September 2025, Regulation 2025 (EU) 1930, which establishes measures to restrict the manufacture, use, and placing on the market of Dechlorane Plus™ along with its syn-isomer and anti-isomer, was published in the EU Eurlex.

Dechlorane Plus is a synthetic substance mainly used as a flame retardant in adhesives/sealants and polymers. Due to its very persistent and very bioaccumulative (vPvB) properties, it was identified by ECHA as SVHC in 2018 and as a persistent organic pollutant by Decision SC-11/10, 2023 of the Conference of the Parties to the Stockholm Convention.

The regulation restricts the presence of DP in substances, mixtures, and articles. It sets maximum concentration limits for DP as an unintentional trace contaminant (UTC). Until 15 April 2028, a UTC limit of 1000 mg/kg (0.1%) is permitted for DP in substances, mixtures, and articles. After this date, this limit is significantly tightened to 1 mg/kg (0.0001%).

To facilitate the various compliance efforts that industry will undertake, the regulation also provides specific exemptions for certain essential applications such as aerospace, space and defence applications, medical imaging and radiotherapy devices, until 26 February 2030.

In light of Decision SC-11/10, the regulation also allows derogations for replacement parts. It permits their continued use where dechlorane plus was initially employed in production, until the end of their service life or 31 December 2043, whichever occurs first.

To prevent the recall of articles with DP that end users in the Union have already used before the exemption expiry date, the regulation permits their continued use.

7.5. Setting New UTC limit value for PBDEs in Annex I

Based on a public consultation initiated until **18 March 2025**, the EU Commission adopted on 24 July 2025 an amendment to address the regulation of polybrominated diphenyl ethers (PBDE) restrictions in Annex I to Regulation 2019/1021. To ensure alignment with scientific progress and international obligations under the Stockholm Convention, the adopted measures specifically focus on the presence of PBDEs as UTC in substances, mixtures, and articles.

The following phased reduction UTC limit values are introduced:

1. For PBDE present in mixtures or articles containing or made of recovered material containing recyclate mixtures:
    a. 500 mg/kg upon the regulation entry into force
    b. 350 mg/kg as of **30 December 2025**
    c. 200 mg/kg as of **30 December 2027**
2. For other mixtures and articles:
    a. 10 mg/kg.

Besides the approved changes to PBDE restrictions, a similar proposal to update polychlorinated biphenyls (PCBs) limits in Annex I is still under review and is likely to be finalised by the end of the year.

Under this proposal, the recommended limit for polychlorinated biphenyls (PCBs) is set at 0.2 mg/kg (0.00002% by weight) for substances, mixtures, or articles where they are present. An exception is allowed for organic pigments, which will enable a gradual reduction of the limit from 25 mg/kg (0.0025% by weight) to 10 mg/kg (0.001% by weight) three years after the amendment takes effect.

08. Conclusion

This paper provided an overview of the most recent regulatory updates regarding chemical restrictions across the EU for 2025. To access the Union market, manufacturers of products containing the newly restricted substances must comply with the requirements outlined in the enacted regulations.

Unlike previous years, EU regulators have not proposed any significant new chemical restrictions or authorisation requirements this year. However, 2026 is expected to be different, with the anticipated resumption of work on the long-awaited REACH revision. There will also be progress towards a complete ban on PFAS and the introduction of essential-use criteria.

These criteria will allow for specific industrial applications of PFAS where no viable substitutes exist and the chemicals are considered critical for health or technology.

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