

Next steps in the ECHA assessment of the PFAS universal restriction proposal under REACH

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PCWP/HCPWP joint meeting, 4 February 2026

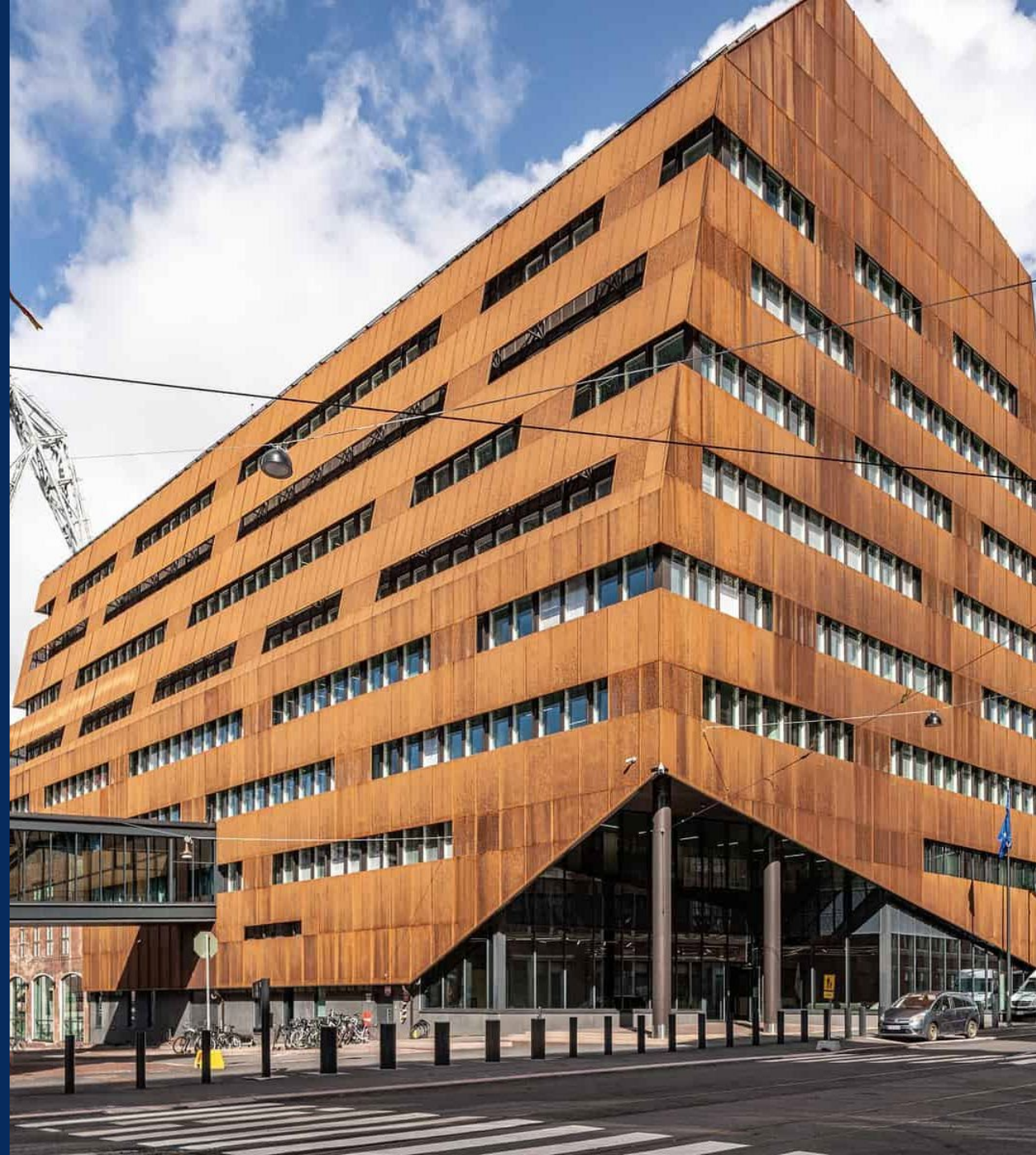


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Status update and planned next steps in scientific evaluation of the proposal to restrict per- and polyfluoroalkyl substances (PFAS)

How PCWP and HCPWP members can find more information on the ECHA website

Disclaimer: the contents of this presentation relate to ECHA processes and are based on publicly available information taken from the ECHA website (see sources listed on the last slide "*Where to find further information*")

Scientific evaluation of the proposal to restrict PFAS

– Current status

- ECHA's scientific committees for Risk Assessment (RAC) and for Socio-Economic Analysis (SEAC) are currently evaluating the proposal to restrict PFAS in the EU/EEA, alongside comments received during the six-month public consultation in March-September 2023. 5,600 responses received
- This evaluation of these widely used chemicals started in September 2023 and it is being carried out in batches, focusing on the different sectors that may be affected by a potential restriction (i.e. the 14 different sectors analysed in the originally submitted restriction proposal, as well as PFAS manufacturing and horizontal issues).
- At the same time, national authorities of Denmark, Germany, the Netherlands, Norway and Sweden, who prepared the proposal (Dossier Submitters), have been updating their initial report to address the consultation feedback.
- This update is now finalised and the updated report, called the [Background Document](#) (dated June 2025), is available on ECHA's website. The Background Document is being evaluated by the committees and will form the basis for their opinions.
- The conclusions agreed at RAC and SEAC meetings between 2023 and 2025 are provisional until the committees finalise the evaluation of the entire restriction proposal (including all sectors of use) and adopt their opinions. These opinions will then be communicated to the public

Timeline of ECHA evaluation per sector/topic

➡ = includes assessment of uses in pharmaceuticals

Sector/Topic	RAC Provisional conclusions:	SEAC Provisional conclusions:
1. Hazards of PFAS (only RAC)	June 2024	N.A.
2. General approach to emissions estimation (including waste) (only RAC)	December 2025	N.A.
3. General approach to socio-economic analysis (only SEAC)	N.A.	December 2025
4. Consumer mixtures, cosmetics and ski wax	June 2024	June 2024
5. Metal plating	June 2024	June 2024
6. Petroleum and mining	September 2024	September 2024
7. Textiles, upholstery, leather, apparel, carpets (TULAC)	November 2024	November 2024
➡ 8. Food contact materials and packaging	November 2024	November 2024
➡ 9. Construction products	November 2024	November 2024
➡ 10. Applications of fluorinated gases	March 2025	March 2025
11. Transport	March 2025	June 2025
12. Energy	March 2025	September 2025
➡ 13. Medical devices	June 2025	June 2025
14. Lubricants	June 2025	September 2025
15. Electronics and semiconductors	September 2025	December 2025
➡ 16. PFAS manufacturing	December 2025	December 2025
➡ 17. Horizontal issues (general aspects of the opinion)	December 2025	December 2025
Opinion including specific sector evaluations	March 2026	March 2026 Followed by a 60-day consultation on SEAC's draft opinion

Clarifications on final scope of the restriction

On 27 August 2025 ECHA [announced](#) the following:

- The information from public consultation led to the identification of a further **8 sectors** (Printing applications, sealing applications, machinery applications, **other medical applications**, military applications, explosives, technical textiles, broader industrial uses) in addition to the 14 sectors analysed in the originally submitted restriction proposal.
- These additional 8 sectors have been assessed by the Dossier Submitter and incorporated into the updated Background Document of June 2025.
- RAC and SEAC considered that including a further 8 sectors into the Committees' evaluations in 2025 would have required significant time beyond 2026 to finalise the opinion with these sectors. Therefore, in the ongoing procedure, the Committees announced they will **not carry out a sector specific evaluation** of these further eight sectors.
- However, the 8 sectors remain in the scope of the restriction as the **evaluation of horizontal issues will cover**, amongst others, the hazard assessment and **risk management measures of general applicability** that are able to monitor and limit emissions of PFAS to the environment (e.g. reporting requirements, PFAS management plan)
- This approach **will ensure that more than 90% of PFAS emissions and volumes are covered** by the opinions, which will be sent to the European Commission for decision making.

Next steps

- RAC is expected to adopt its opinion on **2-6 March 2026** and it analyses the risks of PFAS (incl. for example, concentration limits above which PFAS could be restricted; PFAS management plans etc.)
- SEAC will agree on its draft opinion on **10-13 March 2026**
- A 60-day consultation on SEAC's draft opinion (**April - May 2026**)
 - The SEAC draft opinion will be published shortly after the SEAC March meeting and cover the evaluation of the socio-economic aspects
 - Public consultation will use a **structured survey format (EUsurvey)**, inviting participants to
 - Read carefully the relevant sections of the SEAC draft opinion (RAC opinion is not subject of consultation so information on the risks associated with PFAS will not be considered)
 - Respond to **questions on the potential impacts of restricting the use** of PFAS across various sectors.
 - Provide specific information about the **availability and feasibility of alternative substances and technologies**
- ECHA is expected to deliver the **final opinion to the European Commission** later in 2026 and at the latest **by end 2026**, as announced by the European Commission in the Chemicals Industry Action Plan adopted on 8 July 2025
- The **final decision on the restriction will be taken by the European Commission in 2027** together with the EU Member States following the comitology procedure (CARACAL is the comitology EC expert group for Competent Authorities for REACH and CLP).

ECHA's upcoming consultation on SEAC's draft opinion

Structure of consultation survey

General part

- All interested parties will be asked to comment on several parts of the SEAC opinion (Free text limit 1,000-5,000 characters)

Sector specific parts

- Participants will be asked which specific use or application they want to comment on based on the ECHA [detailed mapping of PFAS uses](#) (which will be updated before the public consultation)

And then for each specific use:

- What is the **availability of alternatives** for this use/application? (multiple choice)
- How **many years** would it take to develop alternatives to a stage where they can be implemented for the use/application?
- What is the **total annual volume (tonnes) of PFAS used** (or imported) for this specific use/application in the EEA?
- If PFAS could not be used in this use/application, what would be the **most likely impact on organisation(s)** covered by your response?
- What is the **average annual gross profit** in euros, based on the past three years, from business operations that depend on this PFAS use/application in the EEA?
- If PFAS could not be used in this use/application, how many **full-time equivalent (FTE) jobs would be lost** in your organisation or the companies covered by your response within the EEA?
- If PFAS could not be used in this use/application, what is the **magnitude of potential negative impacts on society**, e.g. from **lack of access** or worse quality of products (in addition to impacts on employment and profit losses)?
- Describe the costs and feasibility of implementing the risk management measures defined and included in restriction option 3 (RO3) in the SEAC sector specific evaluation for this use/application (free text limit 3,000 characters)

Note: the consultation covers the full scope of the restriction, i.e. including the 8 additional sectors identified in the public consultation



Where to find further information

[ECHA topic page on PFAS](#)

[PFAS restriction proposal](#) (scroll down to RAC & SEAC draft Background Document)

Upcoming consultation on SEAC's draft opinion:

- [Guidance for respondents](#)
- [Online information session: Consultation on PFAS draft opinion](#) (recording of ECHA webinar 30 October 2025)

ECHA background information

[REACH restriction process](#)

[Committee for Risk Assessment, RAC](#)

[Committee for Socio-Economic Assessment, SEAC](#)



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