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REACH restriction proposal on per- and polyfluoroalkyl substance (PFAS) – questions and answers

*These questions and answers explain the **restrictions process** under the EU's chemicals regulation, REACH, and **summarise the key points** from the final opinions of the Committee for Risk Assessment (RAC) and the Committee for Socio-Economic Analysis (SEAC) on the proposal to restrict PFAS in the EU/EEA.*

*The **two committees** issue independent opinions, but these **are complementary**. Together they provide the scientific and socio-economic basis for the final decision by the European Commission and EU Member States on the proposed PFAS restriction.*

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PFAS concern

1. What are per- and polyfluoroalkyl substances (PFAS)

Per- and polyfluoroalkyl substances (PFAS) are a large class of synthetic chemicals that are widely used in society. They all contain carbon-fluorine bonds, which are one of the strongest chemical bonds in organic chemistry. Because of this bond, these chemicals do not degrade easily in the environment.

PFAS are known for their resistance to heat, water and chemicals, which makes them useful in many products. They can be used, for example, in batteries, lubricants, non-stick cookware, water-repellent clothing and textiles, stain-resistant fabrics and carpets, medical devices, food packaging, electronics and semiconductors.

2. Why are PFAS a problem?

The majority of PFAS are persistent in the environment. Some PFAS are known to persist in the environment longer than any other synthetic substance. As a consequence of this persistence, as long as PFAS continue to be released into the environment, people and animals will be exposed to ever greater concentrations. Even if all releases of PFAS would cease

tomorrow, they would continue to be present in the environment, and people, for generations to come.

The behaviour of PFAS in the environment means that they tend to pollute groundwater and drinking water, which is difficult and costly to remediate. Certain PFAS are known to accumulate in people, animals and plants and cause toxic effects. Some are toxic for reproduction and can harm the development of foetuses. Some PFAS may cause cancer in people. Some PFAS are also suspected of interfering with the human endocrine (hormonal) system.

PFAS are released into the environment from direct and indirect sources, for example, from industrial facilities and professionals using PFAS, during use of consumer products (e.g. cosmetics, non-stick frying pans, ski waxes, clothing). People can be exposed to them every day at home, in their workplace and through the environment, for example, from the food they eat and drinking water.

Restriction proposal

3. What is a restriction under the EU's chemicals regulation, REACH?

Restrictions under REACH limit or ban the manufacture, use or placing on the market (including imports) of substances. Their purpose is to protect human health and the environment from unacceptable chemical risks.

These restrictions may apply to substances on their own, in mixtures or articles (products).

An EU Member State or ECHA, at the European Commission's request, can propose a restriction. This proposal is based on a thorough scientific and objective investigation of the matter. During the preparatory phase, open calls for evidence are used to gather information and experiences from the market and scientific community, both within and outside the EU.

The proposed restriction is first subject to a six-month consultation period, allowing anyone to submit scientific and technical information and evidence.

Next, ECHA's two scientific committees – the Committee for Risk Assessment (RAC) and the Committee for Socio-Economic Analysis (SEAC) – evaluate all restriction proposals, taking into account the information submitted by interested parties during the consultation, and form opinions on them. The process also includes a second consultation, which lasts for 60 days and focuses on the *draft* opinion of SEAC.

Once both RAC and SEAC have adopted their opinions, ECHA sends them to the European Commission.

The final decision is taken by the European Commission in consultation with EU Member States. Read more about the process on our website.

4. What is the PFAS restriction proposal about?

The national authorities of the Netherlands, Germany, Denmark, Norway and Sweden have proposed an EU-wide restriction that covers more than 10 000 PFAS across a wide range of uses. The only use not covered by the scope is firefighting foams, as the European Commission adopted a separate restriction on PFAS in those applications in October 2025. The five authorities submitted their proposal to ECHA in January 2023.

This restriction proposal is the most extensive one in the history of the EU, both in terms of number of chemicals and range of uses covered. It includes a group approach for all PFAS, including those that are currently unidentified or not yet manufactured, to prevent regrettable substitution. Regrettable substitution occurs when a hazardous chemical is replaced with another that may pose similar or even greater risks to people or the environment.

The proposal is based on the OECD definition of PFAS, which identifies a specific chemical structure common to all PFAS molecules. It does not contain a list of PFAS that fall within the scope of the proposed restriction but applies to any molecule containing this specific chemical structure.

The restriction proposal covers manufacturing, placing on the market (including imports) and use of PFAS as substances and in mixtures and articles (products). However, it proposes to allow the continued use of mixtures and articles that are already on the market.

The five authorities have identified 23[1] major sectors where PFAS are used. These sectors include for example cosmetics, consumer mixtures, food contact materials and packaging and medical devices. All sectors identified are listed in Table 2 of the updated restriction report (called a Background Document).

The national authorities propose an 18-month transition period before the restriction would become applicable. They also suggest additional time-limited derogations of five or 12 years for certain uses where suitable PFAS-free alternatives are not yet available. For instance, personal protective equipment, refrigerants used in certain applications, and implantable and invasive medical devices would have a 12-year derogation, while non-stick coating in industrial bakeware would have a five-year derogation. Additionally, there are time-unlimited derogations proposed for PFAS used as active substances in plant protection products, biocidal products and human and veterinary medicinal products, as these are covered by their respective regulations. A summary of proposed derogations is in Table 11 in the Background Document.

The five authorities' assessment of the risks of PFAS and their analysis of the restriction proposal's impacts on society have been evaluated by ECHA's scientific Committees RAC and SEAC, respectively. The Committees have taken into account any relevant and substantiated information submitted in the consultations.

5. What are the roles of the five authorities, ECHA and the Committees for Risk Assessment (RAC) and for Socio-Economic Analysis (SEAC) in the restriction?

The authorities of the Netherlands, Germany, Denmark, Norway and Sweden are the *Dossier Submitter*. They have prepared the initial restriction proposal, which is also called an Annex XV restriction report. The restriction proposal was subject to a six-month consultation (March – September 2023). The comments received are available on ECHA's website.

The role of RAC is to provide an opinion as to whether the suggested restrictions are appropriate in reducing the risks to human health and/or the environment and SEAC is to provide an opinion on the suggested restrictions and the related socio-economic impacts. SEAC also examines the availability as well as technical and economic feasibility of alternatives.

During the opinion-making process, the Dossier Submitter updates the restriction proposal (Annex XV restriction report) taking into account the comments from the six-month consultation. This updated restriction report is known as the *Background Document*. RAC and SEAC evaluate this Background Document and form their own opinions based on its information and relevant and substantiated comments received during the consultations. The Background Document is available online.

ECHA's role during opinion making is to manage the stakeholder consultations and the Committee meetings. ECHA staff also support the Committee members appointed as rapporteurs. ECHA's aim is to ensure that the Committees' evaluation is comprehensive and

[1] 14 sectors plus PFAS manufacturing in the original proposal: textiles, upholstery, leather, apparel and carpets (TULAC); food contact materials and packaging; metal plating and manufacture of metal products; consumer mixtures and miscellaneous consumer articles; cosmetics; ski wax; applications of fluorinated gases; medical devices; transport; electronics and semiconductors; energy; construction products; lubricants; and petroleum and mining.

Eight additional sectors added following consultation input: printing applications; sealing applications; machinery applications; other medical applications; military applications; explosives; technical textiles; and broader industrial uses.

relevant to the European Commission and the EU Member States, who take the decision on the restriction.

The proposal, together with the opinions of the Committees, contributes to the decision of the European Commission and EU Member States.

6. What is the scope of the restriction proposal and of the evaluation of the Committees for Risk Assessment (RAC) and Socio-Economic Analysis (SEAC)?

The scope of the restriction includes all PFAS and all uses, except firefighting foams. A separate restriction on PFAS in firefighting foams was adopted by the European Commission in October 2025.

The original proposal submitted to ECHA in January 2023, is based on an analysis of several uses and applications in 14 use sectors plus PFAS manufacturing[2]. The five authorities assessed and added eight sectors[3] to the proposal following the information received during the six-month consultation. The updated proposal, known as the Background Document, was published on 20 August 2025.

RAC and SEAC opinions contain the Committees' evaluation of the updated restriction proposal and take into account the comments from the six-month consultation of the proposal. The evaluation addresses both the general elements of the restriction proposal and sector-/use-specific aspects. The general elements of the proposal include:

- concentration limits above which PFAS will be restricted;
- hazard, emissions and risk;
- specific risk management measures to reduce environmental emissions and exposure;
- socio-economic impacts and proportionality of the proposed restriction as a whole;
- practicality; and
- enforceability.

With respect to the evaluation of the sector-/use-specific aspects, the Committees have focused their evaluation on the 14 use sectors plus PFAS manufacturing evaluated in the initial restriction proposal and have not carried out detailed sector-specific evaluations for the eight additional sectors. This is to ensure that the Committees' evaluations covered in the initial restriction proposal remain relevant and timely. The eight additional sector nevertheless remain within the scope of the restriction proposal. The absence of a detailed sector-specific evaluation by RAC and SEAC does not mean that these sectors are excluded from the proposal or from the subsequent decision-making. The European Commission receives the updated restriction proposal, the Committees' opinions and the information submitted during the consultations, enabling it to consider the original sectors, the eight additional sectors, PFAS manufacturing and the horizontal elements of the proposal when preparing its regulatory proposal.

Transparency and independence

7. How are stakeholders involved in the restriction process? What about transparency?

[2] 15 sectors in the original proposal: PFAS manufacturing; textiles, upholstery, leather, apparel and carpets (TULAC); food contact materials and packaging; metal plating and manufacture of metal products; consumer mixtures and miscellaneous consumer articles; cosmetics; ski wax; applications of fluorinated gases; medical devices; transport; electronics and semiconductors; energy; construction products; lubricants; and petroleum and mining.

[3] Eight additional sectors added following consultation input: Printing applications; sealing applications; machinery applications; other medical applications; military applications; explosives; technical textiles; and broader industrial uses.

Restriction proposals undergo two consultations that are open to everyone. During these consultations stakeholders can submit confidential and non-confidential information through the consultation channels provided by ECHA. This enables businesses and other respondents to provide relevant information without disclosing commercially sensitive details publicly. Non-confidential consultation information is published on ECHA's website, while confidential information is handled in accordance with the applicable confidentiality arrangements.

The first consultation on the initial proposal (Annex XV restriction report) lasted six months. The consultation on the PFAS restriction proposal ran from 22 March 2023 until 25 September 2023 and resulted in over 5 600 comments.

Non-confidential comments from this consultation were published on ECHA's website. RAC and SEAC's general responses, and the responses from the Dossier Submitter to the comments received during the consultation on the Annex XV restriction report are presented in a separate response-to-comments documents, referred to as the RCOM. The Dossier Submitter's RCOM and RAC/SEAC RCOM documents are published in ECHAChem on the PFAS substance page under the Event "Start consultation on restriction proposal".

The second consultation focusing on the *draft* SEAC opinion, lasted 60 days, allowing stakeholders to provide comments on any aspects related to the *draft* opinion. The non-confidential responses to this consultation are also made public. The consultation on SEAC's draft opinion ran from 26 March to 25 May 2026 and resulted in over 3 500 comments.

SEAC's general responses to the comments received will be presented in a separate response-to-comments document, referred to as the ORCOM. The ORCOM is published in ECHAChem on the PFAS substance page under the Event *"Restriction start consultation on SEAC draft opinion".*

ECHA's scientific Committees have taken into account all relevant comments received through these consultations when assessing the proposal and forming their opinions. Specific comment IDs are reflected in the opinion documents only in specific cases and are not listed systematically. The absence of a reference to a given comment ID therefore does not mean that it was overlooked.

To ensure transparency, regular and occasional stakeholders were able to observe the meetings of the RAC and SEAC. More about the committees' procedures: RAC | SEAC

8. How is it ensured that the two committees give independent opinions?

Members of the two scientific Committees are nominated by EU Member States and appointed by ECHA's Management Board in their personal capacity. They are not allowed to take instructions from their nominating or employing Member State and must declare any conflicts of interest related to the proposal. However, Member States are required to support the work of their nominees.

The Committee chairs ensure that the evaluation is independent. ECHA provides support to the Committee members appointed as rapporteurs.

Throughout the evaluation of the proposal, the Committees follow an evidence-based scientific approach.

Risk Assessment Committee's final opinion

9. What are the key points from Risk Assessment Committee's (RAC) adopted opinion?

Overall conclusion

RAC concludes that a restriction on the manufacture, use and placing on the market of PFAS on their own in other substances, mixtures and articles is the **most appropriate and effective** regulatory measure to address the risks they pose.

RAC notes that the Dossier Submitter proposes derogations to allow the continued use of PFAS for those applications where suitable alternatives are not yet available. RAC estimates that these derogations would result in additional PFAS emissions, leading to an uncontrolled risk.

The Committee considers that, if derogations for continued use are allowed, in line with the Dossier Submitter's proposal and SEAC's conclusions, specific risk management measures are required to ensure emissions are minimised. These include supply chain communication, clear consumer labelling, instructions for safe use and disposal and site-specific PFAS management plans, including monitoring of PFAS emissions for manufacturers and industrial users. RAC also calls for reporting of PFAS emissions from manufacturing and industrial uses to ECHA.

Hazards

RAC considers that PFAS as a group are harmful to both human health and the environment. These chemicals remain in the environment for a very long time and do not break down. As they can also move easily through water and air, may have toxic effects, contribute to global warming and travel long distances, PFAS pollution continues to build up over time and is extremely hard to remediate once it reaches the environment.

The Committee supports using the OECD definition of PFAS to determine which substances fall within the scope of the restriction.

RAC notes that **fluoropolymers** show limited evidence of toxicity, mobility or bioaccumulation. However, their whole life cycle leads to significant PFAS emissions – including during production, use, degradation and disposal – and they can generate small polymer particles. For this reason, RAC considers them part of the PFAS concern.

The Committee finds that volatile PFAS, especially **fluorinated gases**, are very persistent, highly mobile and contribute to climate change and the formation of trifluoroacetic acid (TFA)[4] in the environment. Although these gases are generally low in toxicity and some have lower global warming potential, they still pose environmental risks due to their persistence and breakdown products.

Risk assessment approach

In line with the Dossier Submitter's proposal, RAC considers that PFAS should be treated like other highly persistent and bioaccumulative substances: any release corresponds to a risk, and emissions should be minimised as far as possible.

Volumes and emissions

Based on the available information, the Dossier Submitter has estimated that a total of 266 000 tonnes of PFAS were used in the EEA in 2020. Out of this, about 143 000 tonnes were polymeric PFAS (mainly fluoropolymers), 100 000 tonnes were fluorinated gases and 25 000 tonnes PFAAs and PFAA precursors (including side-chain fluorinated polymers).

RAC estimates that PFAS emissions amount to around 70 000 tonnes per year in the EU/EEA, mostly from the use of PFAS in fluorinated gases applications, transport and uses in textiles, upholstery, leather, apparel and carpets. This estimate excludes emissions of PFAS particles, which RAC was unable to quantify reliably. RAC also points to gaps in environmental monitoring.

[4] See Germany's proposal to classify TFA as toxic to reproduction, persistent mobile and toxic (PMT) and very persistent and very mobile (vPvM), among others. The harmonised classification proposal is currently under evaluation by RAC.

The Committee has not evaluated the emission estimates provided by the Dossier Submitter for the eight additional sectors included in the proposal after the six-month consultation.

Effectiveness of the restriction

RAC concludes that a full ban of PFAS (restriction option 1) is an effective measure to minimise PFAS emissions. The Committee estimates that such a ban could reduce emissions by around 96% over the 30-year assessment period compared to the baseline scenario. This does not take into account certain potential emissions, including those from continued use in spare parts, second-hand articles, recycled materials or those from active substances in biocides and pesticides.

The derogations proposed by the Dossier Submitter would reduce the effectiveness to 76%.

Some PFAS used in pesticides, biocides and medicines are regulated under separate legal frameworks. However, RAC considers that these frameworks do not fully address PFAS emissions. The Committee, therefore, recommends that measures to minimise emissions from PFAS in these uses be considered in the relevant sector-specific regulations.

Derogations and required risk management measures

RAC notes that the Dossier Submitter proposes derogations for those uses where suitable alternatives are not yet available. Considering the risks of PFAS, RAC supports the proposed derogations for personal protective equipment and related impregnating agents to ensure workers' safety is not compromised.

RAC considers that the derogations proposed by the Dossier Submitter result in additional emissions and uncontrolled risks, and therefore specific risk management measures should be considered to minimise emissions.

According to RAC, these measures should include:

1. Clear consumer labelling, instructions for safe use and disposal, and effective communication along the supply chain.

2. Site-specific PFAS management plans prepared by manufacturers and industrial users of PFAS and PFAS containing mixtures. These plans should identify which PFAS are used, justify their use and report monitoring results on potential environmental emissions.

RAC also supports the reporting requirements proposed by the Dossier Submitter, which would require manufacturers, importers of PFAS or PFAS-containing articles, and downstream users formulating PFAS-containing mixtures to report the identity and quantity of substances placed on the market in the previous year and suggests extending this requirement to importers of PFAS containing mixtures. In addition, it recommends that manufacturers and industrial users report to ECHA the emissions documented in their site-specific PFAS management plans.



Note that RAC assesses derogations solely from a risk perspective – whether they are justified based on risk considerations. The Committee for Socio-Economic Analysis (SEAC) evaluates whether such derogations are necessary to ensure that the restriction remains proportionate.

Eight additional sectors

Emissions from the eight sectors[5] added to the proposal after the six-month consultation were estimated by the Dossier Submitter at around 5 000 tonnes per year. These sectors were not assessed in detail by RAC and RAC did hence not assess their emissions.

[5] Eight additional sectors added following consultation input: Printing applications; sealing applications; machinery applications; other medical applications; military applications; explosives; technical textiles; and broader industrial uses.

Most of these emissions – about 3 400 tonnes per year – come from fluorinated gases used as propellants in metered-dose inhalers included under the 'other medical applications' sector. Additionally, some of the eight sectors, particularly 'sealing applications', use high volumes of fluoropolymers.

Considering the emission estimates for the additional eight sectors, RAC concludes that its overall recommendation – a requirement to minimise PFAS emissions through the implementation of specific risk management measures – applies to all sectors of use, including the eight additional sectors.

Practicality (including enforceability)

RAC finds the restriction workable overall but emphasises the need for harmonised analytical methods across the EU/EEA. See Advice from ECHA's Enforcement Forum.

The opinion of RAC is available at: PFAS substance page

10. What are the key differences between the opinion of the Committee for Risk Assessment (RAC) and the proposal made by the five national authorities (Dossier Submitter)?

Scope of the restriction

RAC could not support the Dossier Submitter's proposal to exclude specific PFAS sub-groups – considered biodegradable – from the restriction at this stage. Although it acknowledges that degradability can vary across the group, RAC considers that not enough evidence was made available to justify the exclusion of specific PFAS sub-groups.

Emission calculation

During opinion forming, RAC applied a different method to estimate emissions from fluoropolymers. Unlike the Dossier Submitter, it separated emissions into two groups:

1. Chemical emissions during manufacturing, processing, and suboptimal incineration (such as fluorinated gases, by-products and PFAAs).

2. Particle emissions from fluoropolymer wear and abrasion during processing and use.

In RAC's view, it is important to differentiate between particles and chemicals (low-molecular weight PFAS like PFAAs and oligomers) in emissions estimates to accurately understand their environmental impact. Although both forms are persistent, they have different behaviours in the environment and different hazard profiles. Fluoropolymer (micro)particles are generally less bioavailable and toxic than PFAAs and their precursors. Like in the case of other micro/nanoplastics, their bioavailability and toxicity are affected by their particle properties (including size) and are not fully characterised yet.

RAC only calculated the emissions in the first group. It acknowledged that particle emissions occur but could not estimate their quantities.

RAC also differed from the Dossier Submitter by using higher release factors for certain waste management steps, especially for hazardous and non-hazardous waste incineration and for wastewater treatment. Overall, the different approach adopted by RAC resulted in a slightly lower estimate of the total PFAS emissions compared to the Dossier Submitter's assessment.

Derogations and required risk management measures

RAC concludes that derogations as proposed by the Dossier Submitter result in uncontrolled risks that need to be minimised. Considering the risks, RAC supports a derogation for personal protective equipment and related impregnating agents to ensure the safety of workers is not negatively affected.

While RAC agrees with the Dossier Submitter that risk management measures are required to reduce the emissions from any continued PFAS uses allowed under derogations, it considers the measures as defined by the Dossier Submitter are not effective in controlling the risks and, therefore, strengthens them by recommending additional requirements. These include clear labelling, instructions for safe use and disposal for consumers and professionals, and effective communication along the supply chain, as well as site-specific PFAS management plans for manufacturers and industrial users of PFAS and PFAS-containing mixtures, including the monitoring of PFAS emissions.

RAC supports the Dossier Submitter's proposed reporting requirements but considers that the requirement should apply, in addition to manufacturers and formulators, to importers of any PFAS-containing products (substances, articles or mixtures). RAC also recommends that manufacturers and industrial users report to ECHA the emissions documented in their site-specific PFAS management plans.

Socio-Economic Analysis Committee's final opinion

11. What are the key points from the Socio-Economic Analysis Committee's (SEAC) final opinion?

Overall conclusion

SEAC reviewed the relevant and substantiated information submitted during the consultation on its draft opinion. This information confirmed or strengthened several of its preliminary conclusions and in other cases led SEAC to update its opinion, including amendments concerning certain general elements of the restriction, as well as substitution potential, costs, and derogations for specific uses.

SEAC finds that a broad EU-wide restriction addressing PFAS as a group is the most appropriate risk-management option. The Committee considers a ban with use-specific derogations appropriate where the costs to society would outweigh the benefits of an immediate ban, to ensure the overall proportionality of the restriction. SEAC, however, does not agree or cannot conclude on all the specific elements proposed by the Dossier Submitter, as detailed throughout the opinion.

Proportionality and derogations

Based on SEAC's evaluation of the available information on alternatives, costs and benefits, the Committee concludes that a full ban of PFAS with an 18-month transition period (corresponding to restriction option 1 in the Dossier Submitter's proposal) is likely not proportionate. However, SEAC finds the default 18-month transition period generally appropriate while noting uncertainties for uses where it could not conclude on the need for a derogation beyond this period.

While RAC considers a full ban an effective measure to minimise PFAS emissions and human and environmental exposure, SEAC finds that it does not sufficiently balance the benefits and costs, particularly where the available information indicates that substitution is not yet feasible for several of the uses covered by the proposal. Instead, SEAC supports a ban with use-specific derogations when the societal costs of a ban would outweigh the benefits, as this approach better ensures proportionality.

SEAC's evaluation and conclusions regarding derogations are available in the opinion. SEAC emphasises that any derogations it considers justified are regarded as necessary to ensure that the restriction is proportionate, but these derogations may not be sufficient on their own. This is because additional derogations may still be needed for certain uses in order for the restriction to be proportionate. However, uncertainties in the available information for the assessed uses, often due to lack of sufficiently granular data, as well as unknown or unidentified uses stemming from the broad scope of the proposed restriction, prevent SEAC from specifying such additional derogations.

SEAC supports, in principle, the risk management measures proposed by RAC for derogated uses such as site-specific PFAS management plans with monitoring of emissions, labelling, clear instructions for safe use and disposal, and effective supply-chain communication. However, the Committee cannot conclude on the proportionality of these measures because it does not have enough information to assess their costs and benefits. SEAC considers that a longer transition period before reporting requirements, site-specific PFAS management plans and potential additional conditions take effect could be warranted.

Eight additional sectors

The eight sectors added to the proposal by the Dossier Submitter after the six-month consultation have not been evaluated in detail by SEAC. Consequently, the Committee cannot conclude whether the derogations proposed by the Dossier Submitter for specific uses within the scope of these sectors are justified, nor whether additional derogations for other uses within these sectors would be warranted.

SEAC recommends that all uses and applications assessed by the Dossier Submitter in these eight sectors be evaluated as soon as possible. Until this evaluation is completed and an appropriate decision on proportionality can be made, the Committee recommends a time-limited derogation for all uses and applications within the scope of these specific sectors. This approach ensures that any decisions on derogations are based on a thorough evaluation of the availability and technical and economic feasibility of alternatives, and socioeconomic impacts.

SEAC also notes RAC's recommendation to introduce additional risk management measures to minimise PFAS emissions if derogations for these eight sectors are granted.

Practicality (including enforceability)

SEAC finds the restriction, including appropriate derogations, to be implementable, manageable, enforceable and monitorable, while noting challenges related to its practicality and monitorability. The Committee stresses that clear guidance would help address enforcement challenges. A practical, harmonised enforcement approach at EU level is also considered crucial.

12. What did the consultation on the *draft* opinion of the Committee for Socio-Economic Analysis (SEAC) cover?

The consultation focused on the content of the SEAC *draft* opinion, which covers the full scope of the restriction proposal: all PFAS and all uses, except firefighting foams. Stakeholders were invited to provide comments on any aspects of the SEAC evaluation including the eight additional sectors not evaluated by SEAC in detail.

The consultation contained general sections on all aspects of SEAC's evaluation, including analysis of alternatives, costs, benefits, practicality (including enforceability). Information could be provided on any of the aspects of the evaluation for any PFAS use in the scope of the restriction proposal.

In addition, the consultation included sector-specific questions for the sectors evaluated in detail by the Committee. The use mapping published for the consultation reflected the use categories and evaluation levels that were applied in SEAC's draft opinion. It was intended to

help respondents identify the relevant survey and provide information in the appropriate part of the consultation. It did not itself determine the final classification of every individual use or application.

The consultation on SEAC's draft opinion ran from 26 March to 25 May 2026 and more than 3 500 comments were received. Relevant and substantiated information was assessed and generally reflected in SEAC's evaluation. It confirmed or strengthened several conclusions and, in other cases, led to amendments concerning certain general elements, substitution potential, costs and derogations for specific uses.

For more information, see Guidance for respondents and use mapping, mapping of PFAS uses and ECHA's webinar, consultation on the SEAC draft opinion on PFAS restriction - outcome (3 June 2026).

13. When did the Committee for Socio-Economic Analysis (SEAC) adopt its opinion?

SEAC adopted its final opinion in its meeting on 18 November 2026. The final opinion will be submitted to the European Commission by the end of 2026, and it will also be published on ECHA's website in due course.

The adoption of SEAC's opinion concluded ECHA's scientific evaluation of the proposed restriction.

What happens next?

14. Who decides on the restriction?

After RAC and SEAC have adopted their opinions and the related documents have been finalised, ECHA will send the final Background Document and the Committees' opinions to the European Commission. The Commission will also have access to all the information received through the consultations and the relevant response-to-comments documentation. Together, these documents provide the scientific and socio-economic basis for the Commission's preparation of a regulatory proposal.

The Commission will then prepare its draft regulation based on the authorities' proposal and the opinions of ECHA's two committees. This draft regulation to amend the list of restrictions (Annex XVII) to the REACH Regulation will be discussed and eventually voted on by the EU Member States in the Commission's REACH Committee.

If the Member States' vote in the REACH Committee is positive, the draft regulation is sent to the European Parliament and the Council for scrutiny. A positive vote requires a qualified majority (55% of EU countries representing at least 65% of the total EU population).

The Parliament and Council generally have three months to scrutinise the proposal. Either body may object to the proposed act. If objections are raised, the Commission must review its proposal.

The adopted regulation will specify the conditions of the restriction, including transition periods and possible exemptions and derogations.https://commission.europa.eu/law/law-making-process/adopting-eu-law/implementing-and-delegated-acts/comitology_en

Further information:

- ECHA receives PFAS restriction proposal from five national authorities, 13 Jan 2023
  - Restriction proposal and related documents
- ECHA publishes PFAS restriction proposal, 7 Feb 2023
- ECHA seeks input on proposed PFAS restriction, 22 March 2023
- ECHA receives more than 5 600 comments on PFAS restriction proposal, 26 September 2023

- Next steps for the PFAS restriction proposal, 13 March 2024
- ECHA and five European countries issue progress update on PFAS restriction, 20 November 2024
- ECHA publishes updated PFAS restriction proposal, 20 August 2025
- ECHA announces timeline for PFAS restriction evaluation, 27 August 2025
- ECHA to consult on PFAS draft opinion in spring 2026, 15 September 2025
- Five authorities publish summary of updated PFAS restriction proposal, 15 October 2025
- ECHA's Risk Assessment Committee adopts its opinion on PFAS restriction proposal, 3 March 2026
- ECHA's Socio-Economic Analysis Committee agrees its draft opinion on PFAS restriction proposal, 11 March 2026
- ECHA to launch consultation on draft SEAC PFAS opinion, 25 March 2026
- Consultation on SEAC's draft opinion – Have your say until 25 May 2026
- ECHA supports PFAS restriction with targeted derogations, 26 March 2026
- ECHA adopts final opinions on PFAS and Chromium VI restriction proposals, 19 November 2026