



REACH REGULATION UPDATE

# The EU's Universal PFAS Restriction

*What You Need to Know*

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- Proposed scope & who's affected
- Timeline to watch
- Derogations & exemptions
- What to do now

Swipe to learn more →




# What Is the Proposal?

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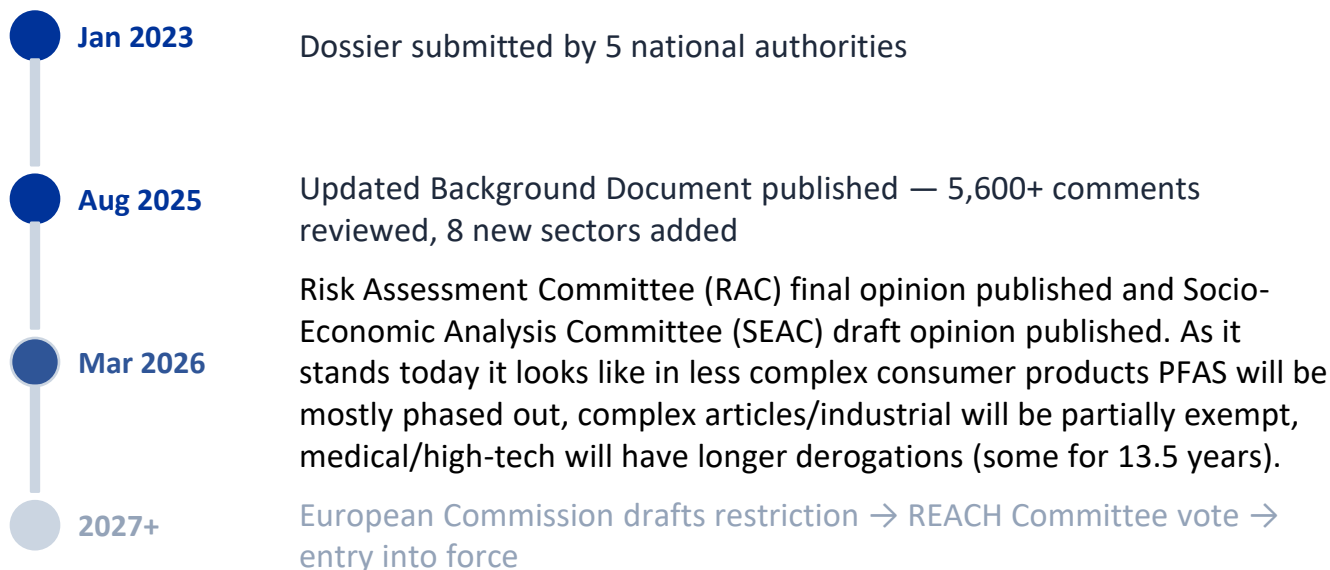
In January 2023, five EU member states submitted a landmark Annex XV dossier under REACH calling for a near-universal ban on PFAS across the EU and European Economic Area.


The core aim: ban the manufacture, use, and placing on the market of all PFAS substances, covering thousands of chemicals as a class rather than one by one.

 This would be the broadest chemical restriction ever attempted under REACH — covering over 10,000 PFAS substances in a single regulatory action.



## Where Are We Now?



 Final restriction could enter into force as early as late 2027, with an 18-month transition period before bans take effect in most sectors.




## Who Is Affected?

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The updated proposal now covers 22+ industrial sectors, including:

- Electronics & semiconductors
- Textiles & apparel
- Food packaging
- Cosmetics & personal care
- Medical devices
- Transport
- Consumer mixtures & misc. articles
- Lubricants & energy
- Construction Products
- Petroleum & mining

 The restriction applies to any company that manufactures, imports, or places products containing intentionally added PFAS on the EU/EEA market — even if you are based outside the EU.



## 3 Restriction Options on the Table

**RO1****Full Ban**

18-month transition, minimal derogations. Considered unrealistic for most sectors.

**RO2****Phased Ban + Derogations**

Most likely outcome. Use specific, time-limited exemptions of 5 to 13.5 yrs for uses where alternatives are not feasible.

**RO3****Conditional Continued Use**

Allows PFAS use under strict emission control measures over full life cycle. Applies where substitution is not feasible in the foreseeable future.




RO2 is the operational baseline most companies should plan for. Note: SEAC also recommended a reporting requirement.



## What Should You Do Now?

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- 1** Map your PFAS exposure — audit products, formulations and supply chains for intentionally added PFAS across all EU/EEA-sold goods.
- 2** Identify your sector's proposed derogation status — 50+ uses have time-limited proposed exemptions. Know if yours qualifies and for how long.
- 3** Start substitution research now — derogation windows (5–13.5 yrs) are not a pass; they're a runway. Use them to reformulate.
- 4** Monitor SEACs final opinion closely — SEAC is expected to finalize its opinion in late 2026.

 The direction of travel is clear: PFAS use in Europe will be heavily restricted. Companies that start now will have more options than those that wait.

## Key Takeaway

# This is not a distant threat — it's an active regulatory process.

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- ✓ Proposal submitted Jan 2023
- ✓ 5,600+ comments reviewed
- ✓ 22+ sectors now in scope
- ✓ RAC final opinion Mar 2026
- ✓ SEAC final opinion could be late 2026
- ✓ Restriction could land 2027+

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