Annex to news: Highlights from September RAC and SEAC meetings

Helsinki, 24 September 2025

REACH restrictions

PFAS, universal

RAC and SEAC were given an overview of upcoming plenary discussions on the REACH restriction proposal submitted in January 2023 by Denmark, Germany, the Netherlands, Norway and Sweden.

In the meetings, RAC and SEAC continued their evaluation of specific uses of PFAS in the following sectors:

- Electronics and semiconductors (RAC provisional conclusions, SEAC focus on analysis of alternatives and costs related to semiconductors);
- Energy (SEAC provisional conclusions);
- Lubricants (SEAC provisional conclusions);
- Horizontal issues (RAC and SEAC focused on updated elements, and will continue with other aspects in December 2025); and
- PFAS Manufacturing (RAC and SEAC introductory discussions only).

Certain chromium (VI) substances

In September, RAC (RAC 74 Restriction working group) and SEAC discussed their first draft opinions on a restriction proposal on certain chromium (VI) substances, which was prepared by ECHA at the request of the European Commission.

Octocrilene

A restriction proposal was submitted by France in July 2025. Both RAC and SEAC concluded that the restriction report conforms to Annex XV requirements. The six-month consultation on the proposed restriction has been launched on 24 September 2025.

REACH applications for authorisation

RAC and SEAC **agreed** on the following seven draft opinions. These will be sent to their respective applicants for commenting:

- Use of chromic acid by Kopal NV and BRT nv;
- Use of chromium trioxide by Pénzjegynyomda Zrt.;
- Use of chromium trioxide by Baaske Oberflächenveredlung GmbH and LB-Oberflaechentechnik GmbH;
- Use of chromium trioxide by Witech GmbH;
- Use of chromium trioxide by SAKO Oy;
- Use of chromium trioxide by SIDERGAMMA SRL, and
- Use of chromium trioxide by Montanhydraulik Werk Werl GmbH.

In addition, SEAC **agreed** also on the following two draft opinions (agreed by RAC in June 2025):

- Use of chromic acid by Robert Bosch Manufacturing Solutions GmbH, and
- Use of chromium trioxide by Satis Coating S.L.U. and Croplas S.L.U.

RAC and SEAC **adopted** 14 opinions, following comments provided by the applicants:

- Uses of chromium trioxide by CTAC Sub2 and co-applicants (Use 1 see here, Use 2 see here, Use 3 see here, Use 4 see here, Use 5 see here, Use 6 see here, Use 7 see here, Use 8 see here, Use 9 see here, Use 10 see here, Use 11 see here, Use 12 see here), and
- Uses of chromium trioxide by Galvanoplast Srl (Use 1 see here, Use 2 see here).

The following committees' opinions were **adopted** automatically, as the applicants chose not to comment on them:

- Use of chromium trioxide by RIBER,
- Use of chromium trioxide by MATIC PLAST MILANO S.R.L.,
- Use of chromium trioxide by Light Mobility Solutions GmbH,
- Use of chromium trioxide by B.A.P. S.r.l.,
- Use of chromium trioxide by Société Française de Galvanoplastie,
- Use of chromium trioxide by SAIC srl,
- Use of chromium trioxide by Hans Giesbert GmbH & Co KG, and
- Use of chromium trioxide by STI Deutschland GmbH and Hartchrom Teikuro Automotive GmbH.

The adopted combined RAC and SEAC opinions on applications for authorisation will be available on ECHA's website in the near future.

REACH Article 77(3)(c) requests

SEAC **adopted** the following five addenda. These will be sent to the European Commission, the EU Member States and to the applicants:

- Uses of chromium trioxide by C. Hübner GmbH (Use 1 see here, Use 2 see here, Use 3 see here);
- Use of chromium trioxide by Kesseboehmer Beschlagsysteme GmbH&Co.KG;
- Use of chromium trioxide by MIKRO METAL S.R.L.;
- Use of chromium trioxide by HAPOC GmbH & Co KG; and
- Use of chromium trioxide by Metalplast srl and CO.BE. sas di Colombo Nadia e Flavia (Use 1 see here, Use 2 see here).

This work by SEAC has been done following a request by ECHA's Executive Director to prepare an assessment of additional information submitted by the applicants as regards certain applications for authorisation and integration into the relevant opinions. This request has been signed on 9 December 2024, and is available on ECHA's website.

By adopting of these five addenda, SEAC finalised its work on this Article 77(3)(c) request.

Occupational exposure limits
RAC adopted its opinion on the scientific evaluation of a limit value for *N*-(hydroxymethyl)acrylamide (NMA). Summary of this opinion is provided in the table below.

Harmonised classification and labelling
RAC adopted eight opinions on harmonised classification and labelling. Summaries of these opinions and on the proposed classifications are provided in the table below.

OEL: RAC adopted one opinion on occupational exposure limits under the Carcinogens, Mutagens or Reprotoxic substances Directive (2004/37/EC)

RAC opinions for OELs will be available on ECHA's website in the near future.

Substance	Uses	RAC opinion
N-(Hydroxymethyl)acrylamide (NMA)	As electrolytes for energy storage In medical applications Grouting agents in tunnels - banned in 1997 (Norway) Occupational exposure may occur upon industrial or laboratory handling via inhalation or dermal contact.	RAC derived an exposure-risk relationship (ERR) expressing the excess cancer risk in function of the concentration of N-(Hydroxymethyl)acrylamide (NMA) in air. RAC recommended a non-cancer 8h time-weighted average (TWA) value to protect from neurotoxicity and reproductive toxicity (testis). RAC acknowledged that because of effects observed in a germ cell clastogenicity assay, a non-threshold mode of action cannot be excluded. Finally, RAC recommended a skin notation to protect from dermal exposure.

CLP: RAC adopted eight opinions on harmonised classification and labelling

Substance	Uses[1]	Existing classification	Proposal by Dossier Submitter	RAC opinion[2]
Choline hydrogen phosphonate (EC -, CAS 947138-30-9)	Systemic fungicide that has activity against Downy mildew in grapevine and Fusarium patch in turfgrass.	No current entry in Annex VI to CLP	The substance does not meet any of the criteria for classification for hazard classes open for commenting. (Belgium)	RAC agreed to the proposal by Belgium.
1,3-Dichloropropene [1]; (*Z*)-1,3-dichloropropene [2]; (*E*)-1,3-dichloropropene [3] (EC 208-826-5 [1] 233-195-8 [2] 431-460-4 [3], CAS 542-75-6 [1] 10061-01-5 [2] 10061-02-6 [3])	A nematicide active substance on tomatoes and cucurbits. Also industrial uses as an intermediate.	Flam. Liq. 3; H226, Acute Tox. 3*; H301, Acute Tox. 3*; H311, Acute Tox. 4*; H332, Skin Irrit. 2; H315, Eye Irrit. 2; H319, Skin Sens. 1; H317, STOT SE 3; H335, Asp. Tox. 1; H304, Aquatic Acute 1; H400, Aquatic Chronic 1; H410, Note D, Note C.	To retain Flam. Liq. 3; H226, Acute Tox. 3; H301, Acute Tox. 3; H311, Skin Irrit. 2; H315, Eye Irrit. 2; H319, STOT SE 3; H335, Asp. Tox. 1; H304, Aquatic Acute 1; H400, Aquatic Chronic 1; H410, Note D, Note C. To modify Skin Sens. 1A; H317, Acute Tox. 3; H331. To add STOT SE 3; H336, STOT RE 2; H373 (stomach), oral ATE = 85 mg/kg bw, dermal ATE = 330 mg/kg bw, M-factors of 1 for aquatic acute and aquatic chronic classification. (Poland)	RAC agreed to the proposal by Poland and concluded that the following classification is also warranted: Carc. 2; H351. For acute toxicity via the oral route the ATE was set at 78 mg/kg bw, and for inhalation the ATE was set at 2.7 mg/L (vapours). Further RAC added 'upper respiratory tract' as target organ for the STOT RE.
Calcium acetylide; calcium carbide (EC 200-848-3, CAS 75-20-7)	A repellent against voles and moles in field crop plants, grassland, vegetable plants, fruit plants and ornamental plants.	Water-react. 1, H260 Note T	To retain: Water-react. 1, H260, Note T. To add: Skin Corr. 1, H314, Eye Dam. 1, H318, STOT SE 3, H335. (Estonia)	RAC agreed to the proposal by Estonia.

[1] Information on uses is based on the info provided in the CLH dossier.

[2] The RAC opinions will be published in the Registry of Intentions in due course.

Substance	Uses[1]	Existing classification	Proposal by Dossier Submitter	RAC opinion[2]
Reaction mass of 2-amino-2-methylpropanol and (2-hydroxy-1,1-dimethylethyl)ammonium chloride [1] (2-hydroxy-1,1-dimethylethyl)ammonium chloride [2] (EC - [1] 221-713-5 [2], CAS - [1] 3207-12-3 [2]	Used in textile dyes and impregnating products.	No current entry in Annex VI to CLP	Skin Irrit. 2; H315, Repr. 1B; H360D and STOT RE 2; H373 (liver). (Austria)	RAC agreed to the proposal by Austria.
[4-[p,p'-bis(dimethylamino)benzhydrylidene] cyclohexa-2,5-dien-1-ylidene]dimethylammonium m-[[p-anilinophenyl]azo]benzenesulphonate [Solvent Black 46] (EC 265-449-9, CAS 65113-55-5)	Used in inks and toners. Release to the environment is likely to occur from use resulting in inclusion into or onto materials (e.g. binding agent in paints and coatings or adhesives).	No current entry in Annex VI to CLP	Aquatic Acute 1; H400 (M = 100) and Aquatic Chronic 1; H410 (M = 100). (Germany)	RAC agreed to the proposal by Germany.
Bis(pentane-2,4-dionato)calcium (EC 243-001-3, CAS 19372-44-2)	Used in articles such as metal, wooden, plastic construction and building materials, flooring, furniture, toys, construction materials, curtains, foot-wear, leather products, paper and cardboard products and electronic equipment. Further in articles based on plastic materials, in formulation or repacking and at industrial sites.	No current entry in Annex VI to CLP	Acute Tox. 4; H302 (ATE = 1250 mg/kg bw), Eye Dam. 1; H318 and Skin Sens. 1A; H317. (Germany)	RAC agreed to the proposal by Germany.

Substance	Uses[1]	Existing classification	Proposal by Dossier Submitter	RAC opinion[2]
Dazomet (ISO); tetrahydro-3,5-dimethyl-1,3,5-thiadiazine-2-thione (EC 208-576-7, CAS 533-74-4):	Used in coating products, anti-freeze products, biocides, lubricants and greases, fillers, putties, plasters, modelling clay and finger paints etc.	Acute Tox. 4 *; H302, Eye Irrit. 2; H319, Aquatic Acute 1; H400 and Aquatic Chronic 1; H410.	To retain Eye Irrit. 2; H319, Aquatic Acute 1; H400 and Aquatic Chronic 1; H410. To modify Acute Tox. 4; H302. To add STOT SE 3; H335, STOT RE 1; H372 (liver), Skin Irrit. 2; H315 and Skin Sens. 1; H317. The DS also proposes to add oral ATE = 415 mg/kg bw and M-factor of 10 for both aquatic acute and aquatic chronic toxicity classification. (Belgium)	RAC agreed to the proposal by Belgium and concluded that the following classification is also warranted: Repr. 1B; H360D.
Fluroxypyr-meptyl (ISO); 1-methylheptyl [(4-amino-3,5-dichloro-6-fluoropyridin-2-yl)oxy]acetate (EC 279-752-9, CAS 81406-37-3)	Herbicide mainly used to control the certain annual broad-leaved weeds as well as some perennial broad-leaved weeds.	Aquatic Acute 1; H400 and Aquatic Chronic 1; H410.	To add M-factors of 10 for aquatic acute classification and 100 for aquatic chronic classification. (Sweden)	RAC agreed to the proposal by Sweden.

The opinions will be available on ECHA's website in the near future:

http://echa.europa.eu/about-us/who-we-are/committee-for-risk-assessment

Background information

Role of RAC in EU's regulatory processes
The committee is responsible for preparing scientific opinions related to the risks of chemicals to human health and the environment for the following processes:

- applications for authorisation;
- proposals for restrictions;
- proposals for harmonised classification and labelling; and
- occupational exposure limits (OELs).

RAC also prepares opinions on specific questions relating to risks of chemicals to human health or the environment and on any other aspects concerning the safety of substances at the Executive Director's request. The final decisions are taken by the European Commission through a comitology procedure.

Role of SEAC in EU's regulatory processes
The committee is responsible for preparing the opinion of the Agency on applications for authorisation and proposals for restrictions.

SEAC also prepares opinions on specific questions relating to socio-economic issues and on any other aspects concerning the safety of substances on their own, in preparations or in articles at the Executive Director's request. The final decisions are taken by the European Commission through a comitology procedure.