Reference:

J. Fabre, M. Beekman and F. Vitobello, *European Commission update on REACH with a focus on Space*, 6th ESA REACH Workshop, ESA ESTEC, Noordwijk, the Netherlands, 17th June 2025

Authors affiliation:

Julien Fabre, DG ENV, European Commission
Martijn Beekman, DG GROW, European Commission
Fabio Vitobello, DG DEFIS, European Commission

European Commission update on REACH with a focus on Space

REACH revision
REACH restrictions

DG ENV Julien Fabre
DG GROW Martijn Beekman
DG DEFIS Fabio Vitobello

Update on REACH revision

Targeted revision of REACH

- **Overall objective**: “simplify rules for the chemicals industry without compromising on safety and environmental protection” (CWP 2025)
- **Timing:** Q4 2025
- Three pillars of the revision:
  1. **Modernise** information requirements on chemicals.
  2. Simplify the **authorisation and restriction** processes and digitalise **supply chain communication**.
  3. Strengthen **level playing field**, including through **compliance and enforcement.**

Pillar 1 - modernisation

Issues: insufficient information for assessing certain risks, e.g. of endocrine disruption; still high reliance on animal testing.

Objective: modernise REACH requirements based on up-to-date science.

Solutions under consideration :

- New information requirements in registration to identify **endocrine disruptors**.
- Foster **non-animal testing** for certain information requirements:
  - Registrants to submit testing proposals for all animal tests
  - Right of ECHA to propose animal-free replacement in compliance checks
  - Replace requirements with animal-free methods if scientifically possible

Pillar 2 – simplification & digitalisation

Issues: difficulties in supply chain communication; too many uses and users covered by the authorisation system, hence overloading the system; authorisation and restriction processes face delays with uncertainties for companies and delayed protection.

Objective: simplify, improve predictability and digitalise.

Solutions under consideration:

- **Digitalise supply chain communication** and improve interface with other legislation.
- Review the dual system of authorisations and restrictions and **reduce** substantially the need for **individual authorisations.**
- Increased use of the **generic risk management approach** still under discussion.

Pillar 3 – level playing field, compliance & enforcement

Issues: enforcement is not consistently effective throughout Member States; high non-compliance rates with REACH requirements, especially for products sold online or imported.

Objective: level the playing field for EU companies

Solutions under consideration:

- ECHA can revoke registration numbers in case on repeated non-compliance
- Empower the Commission to verify the effectiveness of MS's control systems and that they are in line with applicable standards to support an effective and consistent level of enforcement across Member States
- Better alignment and cooperation between **customs** and REACH systems and authorities,
- Empower **OLAF** to investigate illegal cross-border cases regarding chemicals.
- Require an operator to be responsible in the EU for **online sales** of chemicals.

Stakeholders' engagement & feedback

- Extensive consultation of stakeholders on the **REACH revision** carried out under the previous mandate
- **CARACAL meeting** on the REACH revision took place on 3 April
- Next formal opportunity for stakeholders to comment on the REACH revision is **8-week feedback** on the published Commission proposal for the REACH revision: Q4 2025

Update on REACH restrictions

PFAS
Chromium(VI)
Lead in ammunition

Stockholm Convention – PFAS

Global ban on Persistent Organic Pollutants (POPs), in Europe implemented by the POP regulation

- Chemicals list in Annex A (elimination)
  - PFOA (C8)
  - PFHxS (C6)
  - *Listing of Long chain PFCAs decided in May 2025*
- Chemicals list in Annex B (restriction)
  - PFOS (C8) (Listed in Annex I to the POPs Regulation-prohibition)

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REACH Annex XVII – PFAS

- Entry 68: C9-C14 PFCAs (perfluorocarboxylic acids)
- Entry 73: TDFAs (trideca-fluorooctyl silanetriols)
- Entry 79: PFHxA (perfluorohexanoic acid)
  (adopted September 2024, see next slide)

PFHxA, its salts and PFHxA related substances

Restriction on the placing on the market and use in:

- Firefighting foam used for training/testing, by public fire services (from 10 April 2026)
- Consumer clothing, food contact materials made from paper and cardboard, consumer mixtures, cosmetics products (from 10 October 2026)
- Consumer textiles other than clothing (from 10 October 2027)
- Firefighting foam used for civil aviation (from 10 October 2029)

Commission proposal restricting all PFAS in firefighting foams

- In November 2024, Commission published a proposal restricting all PFAS in firefighting foams
- Positively voted in REACH Committee April 2025 (qualified majority)
- Adoption expected end 2025

Commission proposal PFAS in firefighting foams

- General transition period for restriction on placing on the market and use of PFAS in firefighting foams after 5 years
  - Placing on the market portable fire extinguishers: 12 months
    (18 months for alcohol resistant firefighting foams)
    Use of portable fire extinguishers: until 31 December 2030
  - Use for training and testing and by public fire services: 18 months
  - Use for Seveso III sites, offshore oil and gas industry, civil ships already in service and military ships: 10 years
- Obligatory risk management measures after 12 months

Providing clarity on PFAS

- PFAS restriction dossier: during the ongoing independent scientific assessment of ECHA's scientific committees, the **Commission is an observer** .
- The Commission will ensure **consistency across EU policy objectives**; investments in key technologies for the twin transition and EU strategic autonomy should not be disrupted, including the medical and pharmaceutical sector.
- The Commission supports restricting the use of PFAS in **consumer uses**, like cosmetics, food contact materials and outdoor clothing.
- Where adequate alternatives in terms of performance and safety are not available, the continued use of PFAS in **industrial applications**, in particular critical ones, should be ensured.
- Such continued use should take place **under strict conditions for limiting the risks** until acceptable substitutes are found.

Cr(VI) substances under REACH

- Currently: uses of certain Cr(VI) substances subject to authorisation
  - **2018-2020**: COM granted several authorisations to Cr(VI) substances suppliers
    - to cover many different uses by their (many) downstream users
  - **2020-2024**: Increasing number of downstream user applications for authorisation
    - heavy burden for RAC/SEAC/ECHA/COM, backlog in decisions
  - **2023**: Annulment of authorization to 'Chemservice' (actor up the supply chain C-144/21)
    - Incl. 'Use 4' of chromium trioxide in surface treatments in aeronautics/aerospace industries
    - Uses covered by the annulled decision are still allowed until new COM decision is taken
    - CTACSub2 consortium submitted new application, to replace annulled authorization (except Use 3 'decorative character')
    - June 2025: draft RAC/SEAC opinions shared with CTACSub2 consortium
    - COM committed to provide legally robust decisions asap
  - **2024**: ADCR mix of review reports and new applications authorized by COM
    - ADCR = Aerospace and Defence Chromates Reauthorisation consortium

Cr(VI) substances under REACH

- Authorisation approach judged no longer appropriate for regulating risk to human health posed by Cr(VI) substances while they are being phased out where economically/technically viable. Therefore, ECHA prepared a restriction dossier on COM request (see ECHA website)
  - Stakeholders were encouraged to provide information on their uses (2 calls for evidence)
- ECHA opinion making (June 2025 – June 2026);
  COM decision; restriction could be adopted end of 2026 (best case scenario)
- Authorisation regime remains in force in the meantime:
  - ECHA and COM continue to treat applications for authorisation for Cr(VI) substances; conditions of current authorisations remain applicable. Authorisation obligation will be withdrawn only upon entry-into-force of the Cr(VI) restriction.
  - See also recently updated Q&A: https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/297b9de5-6c5b-4e60-919c-8e4291770e79/download

Commission proposal restricting lead in ammunition and fishing tackle

- In February 2025, Commission published a proposal restricting lead in ammunition and fishing tackle
  - Military uses are excluded
  - Includes provisions intended to preserve defence preparedness (e.g. derogation for lead bullets in shooting ranges) and minimise impacts on ammunition industry
- Discussions with MS expected to continue until the end of 2025

Commission proposal restricting lead in ammunition and fishing tackle

- Prohibition to place on the market and use lead gunshot after 3-5 years
  - 15-year derogation for lead shot used in shooting ranges, conditional to appropriate lead containment measures being installed
- Prohibition to use lead bullets after 1,5 – 10 years (depending on the bullet calibre)
  - Permanent derogation for lead bullets used in shooting ranges
- Derogations for:
  - Copper/brass bullets containing less than 3% lead
  - Full-metal-jacket bullets and bullets for seal hunting
  - Muzzle-loading guns and historic firearms
  - Bullets used for traditional events/community events
- Mandatory information requirements after 6 – 18 months

LETTERSS
Lead-free Transition For The EU Space Sector

01/01/2024 > 31/12/2026 **Budget:** 2.7 millions €

Project implemented by the European Commission, responding to the EU Space R&D Programme

Objectives:

- Find solutions to the issues that slow down using COTS with existing SnPb Assembly Technology
- Finding and validating suitable replacement(s) for the SnPb solder, workhorse of the Space Electrical Assembly for 60 years
- Reducing the risks of the Pb-free transition by advancing the state-of-the- art in our understanding of Tin-whisker formation and growth.

Current status and achievements of the project:

- All components have been received and PCB designs have been completed
- Second solder is selected. The Consortium, chose to have one with lower melting temperature, improved reparability potential and reduced thermal stress on components and PCBs during assembly and rework.

Next steps:

- Finalization of Test Plans
- Start PCB Assembly at ASD-F, TAS-F and TESAT with the same manufacturing rules defined and tested.
- Boards will be tested during thermal cycling until sufficient solder failures occur for a Weibull analysis or up to 4000 cycles.
- A test bench is being developed to monitor each package from the 60 PCBs.

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Thank you

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