

Follow-up on the REACH Open Session of the 55th CARACAL Meeting - Comments from the Health and Environment Alliance (HEAL)

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The Health and Environment Alliance (HEAL) thanks the European Commission for the opportunity to provide comments on the items discussed in the 55th CARACAL meeting and would like to share the following comments on one agenda item of the REACH Open Session:

Item 11.3: Annexes I, II and III to the Restrictions Roadmap under the Chemicals Strategy for Sustainability

HEAL appreciates the 27 June 2025 amendment of the Rolling List of (groups of) substances for restriction in application of REACH Article 68 in the Restrictions Roadmap (CA/32/2025) and welcomes the transparency provided by this document. However, we would like to express our concerns about the repeated delays in taking action for key items of its implementation resulting in prolonged exposure to the harmful groups of substances.

We would like to highlight that, based on the Chemicals Strategy for Sustainability (CSS), three main objectives were set down for the Roadmap:

1. Ensure that the commitments under the CSS can be fulfilled in a transparent and timely manner (our emphasis)
2. Provide an overview, through its Rolling List, of using the available authority resources
3. Provide transparency to stakeholders on the restriction work by authorities

While we value the transparency the Restrictions Roadmap delivers (as per objective 3), we lack timely progress in several anticipated restriction initiatives that have been part of the Roadmap since its adoption in 2022 (in contrast to objective 1) and thus question whether sufficient resources are allocated to achieve the Roadmap aims (objective 2). We provide examples of slow progress below (PVC and its additives, flame retardants).

Considering that *“those restrictions aim to maximise the reduction of unacceptable chemical risks with all available resources, by means of broader restrictions, through both grouping of substances, and addressing a wider range of uses (industrial, professional, consumer uses and uses in articles)”* (Restrictions Roadmap SWD(2022) 128 final), **we urge the Commission to fully and urgently deliver on the Roadmaps objectives and the underlying aims of the CSS to the benefit of human health and the environment.**

Examples for groups of substances with anticipated restrictions but very slow progress:

1. PVC and its additives

PVC and its additives have been included in Poo1 of the Restrictions Roadmap since its publication in 2022, with the (anticipated) year of submission of a Commission mandate to ECHA indicated as 2022. In the first update of the Roadmaps Rolling List for restrictions in 2024, the original entry on PVC and its additives has been revised to report that an investigation report on the substances has been published in 2023 and that the Commission is possibly following up on it with a mandate for ECHA for a restriction dossier preparation by Q3 2024. In the latest update of the Roadmaps Rolling List (June 2025), no further progress on the restriction of PVC and its additives is noted and no date for the pending mandate is indicated anymore (“TDB”). **Based on the information from the Restrictions Roadmap, we conclude that progress on the restriction of PVC and its additives in the last three years is limited to an investigation report, which has not been followed up on since its publication.**

HEAL, together with ten other civil society organisations, has recently sent a [letter](#) urging the European Commission to take immediate and ambitious action to restrict polyvinyl chloride (PVC) under the REACH Regulation.

2. Flame retardants

Flame retardants have likewise been included in Poo1 of the Restrictions Roadmap since its publication in 2022, with the (anticipated) year of submission of a Commission mandate to ECHA indicated as 2023. For these chemicals, the Commission indicated the need and intention to prepare a strategy by 2022. The ‘Regulatory strategy for flame retardants’ was ultimately published in 2023. It was subsequently followed up on by a mandate to ECHA for an investigation report on aromatic brominated flame retardants, which was published in December 2024. Meanwhile, in the first update of the Restrictions Roadmap Rolling List, the Commission anticipated its decision on a mandate for a restriction dossier on flame retardants for Q4 2024/Q1 2025. As for PVC and its additives, in the latest update of the Roadmaps Rolling List (June 2025), no further progress on the restriction of flame retardants is indicated and the decision on a restriction mandate has been delayed to Q3 2025. **Based on the information from the Restrictions Roadmap, we draw the conclusion that despite the drafting of a regulatory strategy on flame retardants and an investigation report, the actual restriction of flame retardants has not been officially initiated by the Commission in the last three years.**

HEAL, together with eight other civil society organisations, has sent a [letter](#) in March of this year urging the European Commission to mandate ECHA with preparing a restriction proposal for aromatic brominated flame retardants.

The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 70 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future. env-health.org - HEAL's EU Transparency Register Number: 00723343929-96



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