

The proposed **EU-wide restriction on per- and polyfluoroalkyl substances (PFAS)** is now entering a **decisive phase for companies across multiple sectors**.

Indeed, following several years of scientific assessment, the process is moving towards its final stages, which are expected to result in an amendment to Annex XVII of the Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH) Regulation and the introduction of far-reaching restrictions on the manufacture, placing on the market and use of PFAS in the EU.

On 3 March 2026, the European Chemicals Agency's (ECHA) Committee for Risk Assessment (RAC) **adopted its** opinion on the proposed restriction. The RAC opinion, **which has not yet been made public**, is expected to be published in the coming weeks. Shortly thereafter, **on 11 March 2026**, ECHA's Committee for Socioeconomic Analysis (SEAC) **agreed its draft opinion**, which is likewise not yet publicly available.

The **SEAC draft opinion will be subject to a 60-day public consultation**, expected to be launched in the coming weeks. Unlike the RAC opinion, the forthcoming public consultation on the draft opinion of SEAC represents a critical and time-limited opportunity for companies to engage with the process and ensure that their specific uses, applications and sectoral constraints are properly reflected before the regulatory framework is finalised.

In practice, this consultation represents the **last formal opportunity for companies to influence the substance of the proposed restriction** before the file moves into the European Commission for decision-taking.

Public Consultation on SEAC Draft Opinion

The consultation will be open to all interested stakeholders, and submissions must be made through ECHA's online platform. There are no formal standing requirements. In practice, however, submissions tend to carry greater weight where they are supported by robust evidence and clearly address sector-specific uses and impacts.

The consultation will focus on SEAC's draft opinion, which addresses, in particular:

- The **socioeconomic impacts** of the proposed restriction
- The availability and technical and economic feasibility of **alternatives**
- The overall **cost-benefit balance** of the regulatory options under consideration

Importantly, the consultation **does not constitute a general reopening of the restriction proposal**. Rather, it is limited to comments on SEAC's preliminary conclusions.

Within this framework, stakeholders may, for example, **seek to challenge or refine SEAC's assessment of costs and impacts**, provide **new technical or economic evidence** (including as regards substitution constraints or timelines), or **support the case for derogations, transitional periods, or differentiated regulatory treatment**.

The consultation will run for a period of **60 days from its launch** (expected in March or April 2026). Extensions are not typically granted, and late submissions are generally not taken into account. Time will therefore be of the essence, and companies should get ready to comment within a tight timeframe.

Strategic Importance of Participation

Participation in the SEAC consultation is of critical importance. SEAC is required to take into account relevant information submitted during the consultation before finalising its opinion.

The final SEAC opinion, together with the RAC opinion, will form the basis of the consolidated ECHA opinion transmitted to the European Commission.

At subsequent stages of the process, including the commission's preparation of a draft measure and discussions within the REACH Committee under the comitology procedure, **opportunities for stakeholders to influence the substance of the restriction are more limited** and are not conducted through an open, public consultation process.

In practical terms, the SEAC consultation therefore represents the last formal stage at which stakeholders can introduce new evidence and substantively shape the regulatory outcome.

Indicative Timeline

The RAC opinion and the SEAC draft opinion are anticipated to be published in March-April 2026, after which a 60-day consultation on the SEAC draft opinion is expected to be launched.

Following the consultation, SEAC is expected to finalise and adopt its opinion by the end of 2026, taking into account the submissions received. **The combined ECHA opinion would then be transmitted to the European Commission later in 2026.**

On that basis, **the commission is expected, in early 2027, to consider the preparation of a draft amendment to Annex XVII of the REACH Regulation**. The draft measure would then proceed through the comitology procedure, including consultation of Member States in the REACH Committee, a World Trade Organization notification, and a scrutiny period by the European Parliament and the council, ultimately leading to the adoption and publication of the restriction.

How We Can Assist

We are uniquely positioned to assist stakeholders at this critical juncture. We are Europe's largest chemicals law firm, and combine deep regulatory and advocacy experience across sectors impacted by PFAS regulation.

We support clients in **understanding and anticipating the implications of the proposed restriction**. We can assist in the **preparation and submission of robust, evidence-based contributions to the SEAC consultation**, including the development of arguments in support of derogations, appropriate transitional periods and proportionate regulatory treatment.

Beyond the consultation phase, **we work with clients to develop forward-looking strategies**, including preparing for potential restrictions, assessing **alternative compliance pathways**, and **supporting engagement** at EU level during the commission and **comitology stages** where relevant.

Given the limited window for meaningful input, early preparation and careful strategic positioning will be essential. We remain available to assist clients as needed. Contact details are set out on this page.

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