KEMIKAALITIETO

Marras-joulukuu 2025
31.12.2025

1. YLEISTÄ

2. KEMIKAALILAINSÄÄDÄNTÖ

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Sisällysluettelo sivunumerot

1. YLEISTÄ

1.1 Viranomaiskokoukset

MMM:n ELV vierasaineasiantuntijoiden kokouksessa 11.11. kerrottiin viimeisimmät julkaistut EFSAn riskinarviot: perkloraatti, fluori ja lyijy. EFSA:n lausunnot löytyvät täältä: https://open.efsa.europa.eu/questions?foodDomains=Conta-minants&status=Published_Publishing
Todettiin, että syyskuun pysyvän komitean kokouksessa päätettiin muutoksista vierasaineiden valvontaohjelman frekvenssiin muutos eläinperäisten elintarvikkeiden osalta.
Asetusluonnokset alkavat olla valmiina äänestystä varten yhdistelmäelintarvikkeiden ja vauvanruokien 3-MCPD ja glysidyyliesterien sekä vauvanruokien furaanien enimmäismääristä. Pysyvän komitean julkaistavat asiakirjat löytyvät täältä: https://food.ec.europa.eu/horizontal-topics/committees/paff-committees/novel-food-and-toxicological-safety_en .

Vuoden 2025 aikana työryhmäkokouksia on ollut harvakseltaan. Kertauksena yhteenveto heinäkuun maatalousvierasaineasioiden kokouksessa esillä olleista asioista:
- ∆-9 THC: ML kuiville lehdille ja valmiille vesiuutteelle. Valmisteilla U-kirjelmä markkinajärjestelyasetuksen (CMO) muutoksesta, jolla säädellään tukikelpoisen hampun määritelmää. Tällä ei vaikutusta elintarvike- tai rehusääntelyyn.
- Erillinen asetus toimijoiden omavalvonnan mykotoksiinien ja kasvitoksiinien näytteenotto- ja analyysivaatimuksille
- Pyrrolitsidiinialkaloidit: tietyille yrteille, yrttihaudukkeille ja ravintolisille mahdollisesti pieniä muutoksia
- OTA: päivitys (kuivattu aprikoosi, mulperimarjat)
- HCN päivitys (aprikoosinsiemenet)
-Näytteenotto- ja analyysiasetukseen päivityksiä
Teollisten ja ympäristövierasaineiden työryhmäkokous on tulossa 25.11. Siellä asialistalla on seuraavia asioita:
- Lyijy: EU:n ML päivitetään Codexin keskustelujen perusteella.
- Fluoridi: keskustelua mahdollisesti ML-tarpeesta EFSAn riskinarvion perusteella.
- Metallit ja jodi merilevässä: metallien (Cd, Pb, iAs) osalta edetään levälajeittain.
- Hg tölkkitonnikalassa: harkinnassa ML 0,5 mg/kg (vs. tuore tonnikala 1 mg/kg).
- Prosessikertoimet: keskustelua, voisiko prosessikertoimia harmonisoida
- PAH: enimmäismäärä myös lihoille ja lihatuotteille, joissa savunmakua/ käytetty savustettuja ainesosia.
Odotettavissa enimmäismääriin tiukennuksia savuaromien käyttökiellon johdosta, mutta poikkeukset

perinteisesti savustetuille tuotteille saanevat jatkaa. Lisäksi muita muutoksia: ML freekehjyville sekä äidinmaidonkorvikkeen, vieroitusvalmisteen ja pikkulasten valmisteen ML-päivitys (erit. LOQ:n tiukennus).
- Furan-2(5H)-one and bentseeni-1,2-dioli savustetuissa tuotteissa: monitorointisuosituksen valmistelu savuaromien käyttökiellon johdosta. Muitakin haitallisia yhdisteitä lisätään, EFSA käy tätä läpi kirjallisuudesta. Monitorointiin myös savujuustot. Mahdollisesti asetetaan myöhemmin elintarvikkeiden raja-arvoja.
- Akryyliamidi: pitoisuudet eivät EU:ssa ole vähentyneet toivotusti. Pyritään etenemään ML-arvojen osalta 2025 aikana äänestykseen.
- Mineraaliöljyistä: aihe ei agendalla 25.11 työryhmäkokouksessa. Mineraaliöljyjen aromaattisille hiilivedyille (MOAH) ehdotetaan yleistä ML art 3 soveltaen, lisäksi tietyille elintarvikeryhmille erillinen ML. Olisi tulossa sovellettavaksi 1.1.2027, runsaasti siirtymäaikoja. Äänestykseen joko joulukuussa tai todennäköisemmin helmikuussa. Samanaikaiset keskustelut lisäaineille, joiden spesifikaatteihin tulossa vastaavia rajoituksia.

Tyydyttyneille (MOSH) aiotaan antaa monitorointisuositus (+tietyille MOAH), lisäksi näytteenotto- ja analyysiasetuksen päivitys. KOM:n ja jäsenmaiden lausuma harmonisoiduista LOQ edelleen voimassa. KOM sivuilla lisätietoa mineraaliöljyistä (mm. Q&A, linkit lausumaan). Tulossa EURL:n ohje GCxGC-menetelmästä. Ruokaviraston ja Tullin edustajat totesivat, että analytiikka tulee olemaan haastavaa, sillä sääntelyyn tulossa laaja joukko matriiseja. Myös tulosten tulkinta vaatii tarkkuutta. Menetelmä on kallis ja vaativa. Olisi kannattavampaa, että vain tietyt NRL:t erikoistuisivat tähän analytiikkaan.

Codexin puolella vierasainekomitea viime kesänä on päätetty enimmäismääristä lyijyn ML kuorimaus-eille ja kuivayrteille. Lisäksi päätetty menettelytapakoodista maapähkinän mykotoksiinipitoisuuden vähentämiseksi ja näytteenottosuunnitelmista mykotoksiineille mausteissa. Seuraavassa kokouksessa lokakuussa 2026 useita uusia keskusteluasiakirjoja, mm. viljojen ergotalkaloidien, T2/HT2:n ja AfT:n ML sekä menettely-tapakoodi Cd vähentämiseksi.
Valvonnan havaintoina kuultiin, että mykotoksiinitilanne viljoissa on ollut huono.
Valvontanäytteiden maksuja aletaan kerätä laajemmin v. 2027. V. 2026 aikana kerätään toimijoilta ja valvontayksiköistä tietoa tuotantomääristä, joiden perusteella maksut asetetaan.
EU:n nousevien riskien kokouksessa (ERE) on tullut esiin ukrainalaisten elintarvikkeiden kloropikriinihavainnot (metyylikloroformi), mahdollisesti kemiallisten aseiden käytön johdosta. Kyseessä on EU:ssa kielletty torjunta-aine.

Kasvinsuojeluaineiden kestävän käytön kansallisen toimenpideohjelman (NAP) ohjausryhmän kokouksessa 2.12. keskusteltiin ehdotuksesta erityisesti tarkkailtavien kasvinsuojelutehoaineiden listasta, joka on parhaillaan päivitettävänä. Ehdotusta oli työstetty aiemmin työpajassa lokakuussa. Tukes tekee

lopullisen päätöksen tarkkailtavista aineista ja samalla pyrkii huomioimaan komission auditoinnista saatua palautetta puitedirektiivin kansallisesta toimeenpanosta. Auditointi oli viime kesäkuussa.
Lisäksi kuultiin ensimmäisiä kokemuksia miehittämättömien ilma-alusten käyttöön koetoiminnassa liittyvästä (kasvinsuojeluaineiden dronelevitys) lupaprosessista.

Kemikaalineuvottelukunnan biosidijaoston kokouksessa 8.12. oli käsitelty toimivaltaisten viranomaisten kokouksen ja biosidikomitean joulukuun kokousten agendalla olevia asioita ja keskusteltu tehoaine etanolin tilanteesta. Tukes tiedotti etanolin käsittelyprosessista 6.11. Biosidikomiteassa käsittelyssä on usean tehoaineen hyväksynnän voimassaolon jatkaminen, useimmissa tapauksissa 31.12.2028 asti. Näistä tulee vuoden 2026 alkupuolella EU:n säädökset viralliseen lehteen. Tebukonatsolin (PT8) osalta jatkoaikaa ehdotetaan 30.6.2027 asti. Etofenproksia koskeva hakemus on vedetty pois, joten aiemmat hyväksynnän jatkoajatkin perutaan. Huomioitavaa on, että etofenproxia sisältävillä PT8/18 valmisteilla käsiteltyjä esineitä voi saattaa markkinoille 180 vrk peruutuspäätöksen tultua voimaan. muun muassa formaldehydiä vapauttavia tehoaineita esitetään hyväksyttäväksi tiettyihin käyttöihin vaikka derogaatiokriteeri täyttyy, samoin DBNPA (PT 11 viideksi vuodeksi). Alfakloraloosin hyväksymistä jatketaan 2027 loppuun asti ja hiilidioksidin käytön edellytyksiä tarkennetaan (vaikutus valmistelupiin). Puunsuoja-aineiden kuparihydroksidi ja kupari(II)oksidi hyväksymistä ehdotetaan jatkettavaksi tällä erää 31.7.2029 asti. Yleisesti jatkoaikojen myöntämisen syynä on riskinarviointityön viivästyminen.

Kemikaalineuvottelukunnan tuotejaoston kokouksessa 12.12. kerrattiin jo Kemikaalifoorumissa kuultua kemikaalilainsäädännön tilannekatsausta ja omnibus-ehdotuksia. Komission muutosehdotusten käsittely jatkuu sekä parlamentissa että neuvostossa, joten lopputulos on mitä suurimmassa määrin tässä vaiheessa epävarma.
Käytiin myös läpi pysyvän komitean agendalla olevia asioita. Itse komiteassa hyväksyttiin mikromuovirajoitusta koskeva korjaava asetus sekä kuusi kromiyhdisteitä koskevaa lupaa.
Lyijyn käyttöä ammuksissa koskeva rajoitusehdotus ei edelleenkään näytä saavan riittävää tukea jäsenvaltioilta, mutta kalastustarvikkeita koskeva lyijyrajoitus saattaa edetä äänestykseen seuraavassa kokouksessa. Myös CMR-rajoitusten päivitys etenee: komissio valmistelee ilokaasua koskevaa poikkeusehdotusta toiveenaan äänestys helmikuussa. Syanamidin lannoitekäyttöä koskevan rajoitusehdotuksen jatkovalmistelua varten on pyydetty lisätietoja teollisuudelta. Kreosoottirajoituksen muuttamista koskeva ehdotus on lähdössä WTO-konsultaatioon ja julkiseen kuulemiseen, ja saattaa myös olla äänestysasia helmikuun komiteassa.

1.2 EuroCommerce InBrief –poimintoja

Presenting our 10 legal recommendations for a level playing field

In the past weeks, our Director for the internal market, digital and consumer policy, Ilya Bruggeman, addressed a number of platforms including, the Euroconsumers Forum 2025, the BEUC conference on Consumer policy in a changing world: a 2030 vision for the EU and the EESC European Consumer Day 2025. He presented our views on the Commission's new 2030 Consumer Agenda, improving consumer protection and our legal recommendations against unfair competition from third country marketplaces and traders. Our proposals were in general well-received i.e. strengthening the role of the Commission, improving coordination and collaboration across enforcement domains at national and EU level, speeding up the revision of the Consumer Protection Cooperation Regulation, quickly finalising the Customs Review, introducing a certified authorised representative, an EU instrument to block market access, etc. Interesting to note, is that the Commission and consumer associations present the announced Digital Fairness Act as a solution against unfair competition from third countries.

Customs Reform

On 13 November, the Council ministers formally agreed to abolish the longstanding EUR150 De Minimis threshold for small parcels imported from third countries. From early 2026, customs duties will therefore apply from the first euro for e-commerce parcels. As part of the same package, ministers endorsed a "temporary solution" for 2026 to levy duties ahead of the launch of the EU Customs Data Hub, the future centralised IT system.

Despite this apparent progress, there is limited progress over the customs reform. Today's trilogue (10 December) will be the fourth negotiation on the reform. The Danish Presidency hopes it will be the final round, but that will depend on movement from Member States on key issues such as the Data Hub and the penalty regime for non-compliant companies.

We submitted a letter to legislators and the Commission supporting the accelerated removal of the De Minimis threshold. We have called for the adoption of an EU-wide handling fee much sooner than currently foreseen. We also warned that national handling fees, which are currently being prepared in Belgium, France, the Netherlands, Romania and Luxembourg, and under discussion in Italy and Spain, risk creating fragmentation and unmanageable IT and regulatory burdens for legitimate businesses.

Co-legislators agree on delaying and simplifying anti-deforestation measures

On 4 December, the Council and European Parliament agreed on the proposal of the European Commission for a targeted review as regards certain obligations of operators and traders. Importantly, it delays the date of application by one year to 30 December 2026 and to 30 June 2027 for small and micro businesses.

Furthermore, it removes the obligation for downstream operators and traders to submit due diligence statements, or to ascertain due diligence actions at supplier level - instead keeping these obligations for the first placer on the market. The first downstream operator is however required to collect and store the reference numbers and declaration identifiers.

Small and Micro businesses in low-risk areas would also not be required to upload due diligence statements and instead submit a one-time simplified declaration. A review is foreseen by 30 April 2026, evaluating the administrative burden and impact of the EUDR, and accompanied by a legislative proposal where appropriate. Interestingly, the co-legislators also agreed to remove certain printed products (such as books, newspapers, printed pictures) from the scope of the regulation.

Next steps: The agreement is expected to be adopted at the last plenary meeting of the Parliament on 16 December after which the new rules will be published in the Official Journal. We will continue to engage with members to obtain further clarification and prepare for the evaluation exercise.

Vitamins & Minerals, push for science-based and realistic MPLs

We have joined forces with other stakeholders to send a joint letter and meet with DG SANTE regarding the proposed Maximum Permitted Levels (MPLs) for vitamins and minerals in fortified foods and supplements. While the Commission's working model has gained support from Member States, the current approach could set levels so low that many products would need changes or even disappear from the market. We fully support harmonisation for legal certainty, but it must be science-based, practical, and proportionate. We have asked the Commission to carry out a full impact assessment, considering effects on consumers, public health, and businesses. We kindly asked members to share our statement and the key messages with the relevant ministry. We already shared our position with the food safety and agricultural attachés at the Permanent Representations.

Next steps: We will continue to engage closely and keep members informed as the process moves forward.

Green Claims Directive: progress stalls

On 28 November, at a meeting of the Council Working Party the Danish Presidency confirmed that the European Parliament remains reluctant to advance the file, and expectations from the Commission are low. The Danish Presidency worked hard to explore whether a new majority could be formed. However, given the current political landscape, this was not possible. Previously, we issued a joint statement highlighting concerns about the complexity, costs, and negative impact on sustainability communication. We concluded that the proposed simplification of procedures remained insufficient. Without meaningful improvements on simplification, we encouraged continued negotiation and careful consideration, rather than premature adoption, while taking into account the current implementation of the Empowering Consumers for the Green Transition (ECGT) Directive before moving forward.

Next steps: The Cypriot Presidency does not appear to prioritise this dossier, meaning progress is unlikely in the short term. We will continue to monitor developments closely and keep members informed.

New drafts for simplified CSRD reporting standards

As part of the first omnibus proposal on sustainability reporting, the European Commission mandated EFRAG, the technical body that developed the European Sustainability Reporting Standards, to simplify and revise these standards. In two consultations, we provided feedback and suggestions to streamline and simplify the requirements. A draft of the revised standards has now been published, and many of our recommendations were taken into account. EFRAG proposes to reduce the number of mandatory data points by 60%, introduce shorter and clearer requirements, and implement a simplified materiality assessment. Based on these drafts, the Commission will prepare a Delegated Act to update the CSRD standards.

The published draft: https://www.efrag.org/en/news-and-calendar/news/efrag-provides-its-technical-advice-on-draft-simplified-esrs-to-the-european-commission

Next steps: The Commission needs to adopt the revised standards via a Delegated Act, which is expected in 2026.

2. REACH, CLP JA MUU KEMIKAALILAINSÄÄDÄNTÖ

2.1 ECHA

Lupahakemukset

Viisi kromitrioksidilupahakemusta kuulemisessa 7.1.2026 asti.

Ehdotukset luvanvaraisten aineiden listalle liittämiseksi tai listalla olevan aineen tietojen päivittämiseksi (REACH liite XIV)

Tällä hetkellä ei ole kuulemisia menossa.

Kemikaalirajoitukset: *Jäsenvaltio tai ECHA voi aloittaa rajoitusmenettelyn, jos on aihetta epäillä, että jonkun aineen aiheuttamat riskit sitä edellyttävät. Rajoitusedotuksen käsittelyyn kuuluu julkinen kuuleminen. Saatuaan lausunnot ECHAn riskinarviointi- ja sosioekonomiselta komiteoilta komissio toimittaa luonnoksen muutoksista rajoituksia koskevaan luetteloon REACHin liitteessä XVII. Lopullinen päätös tehdään komiteamenettelyssä jäsenvaltioiden ja Euroopan parlamentin valvonnassa.*

Rajoitusehdotukset:

Name	EC Number	CAS Number	Start of consultation on Annex XV report	Early submission date for comments on Annex XV report	End of consultation on Annex XV report	Start of consultation on SEAC draft opinion	End of consultation on SEAC draft opinion
Certain chromium(VI) oxides, oxyacids and salts	-	-	18/06/2025	18/09/2025	18/12/2025		
Octocrilene	228-250-8	6197-30-4	24/09/2025	23/01/2026	24/03/2026		
Per- and polyfluoroalkyl substances (PFAS)	-	-	22/03/2023		25/09/2023		

Pyynnöt kommentoida ja esittää todisteita (rajoitusehdotusten valmistelu)

Name	EC Number	CAS Number	Start of consultation	Deadline for providing input	Subject of the call
Group of phenyl-p-phenylenediamines (PPDs) and para-substituted phenylenediamines (PDs)	-	-	17/12/2025	13/02/2026	Call for evidence on PPDs (incl. PDs) in rubber tyres

Erityistä huolta aiheuttavien aineiden (SVHC) tunnistaminen ja lupa-aineiden luetteloon ehdottaminen *ovat ns. lupaprosessin ensimmäisiä vaiheita. Jäsenvaltio tai ECHA voi ehdottaa tietyn aineen tunnistamista SVHC-aineeksi. Ehdotuksen käsittelyyn kuuluu julkien kuuleminen, jossa voi esittää huomautuksia tai toimittaa lisätitoja liittyen esim. aineen ominaisuuksiin, käyttöihin ja riskeihin tai vaihtoehtoisiin aineisiin. Jos aine lopulta tunnistetaan SVHC-aineeksi, se lisätään niin sanottuun kandidaattiluetteloon, joka on luettelo aineista, jotka mahdollisesti sisällytetään luvanvaraisten aineiden luetteloon (REACHin liite XIV).*

Aineen sisällyttäminen kandidaattiluetteloon luo tietyissä tapauksissa oikeudellisia velvoitteita yrityksille (KTT, kemikaali-ilmoitus, kuluttajan oikeus saada tieto, ilmoitus ECHAlle).

Seuraavana vaiheena ECHA priorisoi kandidaattiluettelossa olevia aineita lupa-aineiden listalle lisäämiseksi. Sen laatima suositusluonnos asetetaan julkisesti kuultavaksi ennen lopullisen suosituslistan ja ECHAn jäsenmaiden komitean lausunnon toimittamista komissiolle, joka lopulta tekee päätöksen luvanvaraisten aineiden luetteloon sisällytettävistä aineista.

Erityistä huolta aiheuttavien aineiden (SVHC) tunnistaminen

Tällä hetkellä ei ole kuulemisia menossa.

Harmonisoidut luokitusehdotukset

Name	EC Number	CAS Number	Hazard classes open for commenting	Start of consultation	Deadline for commenting
2,4,6-tris(dimethylaminomethyl)phenol	202-013-9	90-72-2	Acute toxicity - oral Skin corrosion/irritation Serious eye damage/eye irritation Skin sensitisation	10/11/2025	09/01/2026
3,5,5-trimethylhexanoic acid and its salts, with the exception of those specified elsewhere in this Annex	-	-	Acute toxicity – oral Reproductive toxicity	17/11/2025	16/01/2026
brodifacoum (ISO); 4-hydroxy-3-(3-(4′-bromo-4-biphenylyl)-1,2,3,4-tetrahydro-1-naphthyl)coumarin	259-980-5	56073-10-0	Acute toxicity – inhalation Acute toxicity – dermal Acute toxicity - oral	15/12/2025	13/02/2026
fluoxapiprolin (ISO); 2-{3-[2-(1-{[3,5-bis(difluoromethyl)-1H-pyrazol-1-yl]acetyl}-4-piperidinyl)-1,3-thiazol-4-yl]-4,5-dihydro-1,2-oxazol-5-yl}-3-chlorophenyl methanesulfonate	-	1360819-11-9	Explosive Flammable solid Self-reactive substance or mixture Pyrophoric solid Self-heating substance or mixture Substance or mixture which in contact with water emits flammable gas Oxidising solid Substance or mixture corrosive to metals Acute toxicity – inhalation Acute toxicity – dermal Acute toxicity – oral Skin corrosion/irritation Serious eye damage/eye irritation Respiratory sensitisation Skin sensitisation Germ cell mutagenicity Carcinogenicity Reproductive toxicity Specific target organ toxicity - single exposure Specific target organ toxicity - repeated exposure Aspiration hazard Hazardous to the aquatic environment	15/12/2025	13/02/2026

propaquizafop (ISO); 2-[(isopropylideneamino)oxy]ethyl (2R)-2-{4-[(6-chloroquinoxalin-2-yl)oxy]phenoxy}propanoate	-	111479-05-1	Explosives Flammable solids Self-reactive substances and mixtures Self-heating substances or mixtures Substances or mixtures which in contact with water emit flammable gases Oxidising solids Acute toxicity – inhalation Acute toxicity – dermal Acute Toxicity - oral Skin corrosion/irritation Serious eye damage/eye irritation Skin sensitisation Germ cell mutagenicity Carcinogenicity Reproductive toxicity Specific target organ toxicity — single exposure Specific target organ toxicity — repeated exposure Hazardous to the aquatic environment	03/11/2025	02/01/2026
quizalofop-P-ethyl (ISO); ethyl (2R)-2-{4-[(6-chloroquinoxalin-2-yl)oxy]phenoxy}propanoate	-	100646-51-3	Explosives Flammable solids Self-reactive substances and mixtures Pyrophoric solids Self-heating substances or mixtures Substances or mixtures which in contact with water emit flammable gases Oxidising solids Corrosive to metals Acute toxicity – inhalation Acute toxicity – dermal Acute Toxicity - oral Skin corrosion/irritation Serious eye damage/eye irritation Respiratory sensitisation Skin sensitisation Germ cell mutagenicity Carcinogenicity Reproductive toxicity Specific target organ toxicity — single exposure Specific target organ toxicity — repeated exposure Aspiration hazard Hazardous to the aquatic environment Hazardous for the ozone layer	17/11/2025	16/01/2026

reaction products of phosphoryl trichloride and methyloxirane [1]; tris(2-chloro-1-methylethyl) phosphate [2]; bis(2-chloro-1-methylethyl) 2-chloropropyl phosphate [3]; bis(2-chloropropyl) 2-chloro-1-methylethyl phosphate [4]; tris(2-chloropropyl) phosphate [5]; any individual stereoisomer of the substances listed above and any combination thereof [6]	- [1] 237-158-7 [2] - [3] - [4] 228-150-4 [5] - [6]	1244733-77-4 [1] 13674-84-5 [2] 76025-08-6 [3] 76649-15-5 [4] 6145-73-9 [5] - [6]	Carcinogenicity Germ cell Mutagenicity Reproductive toxicity Endocrine disruptor for human health	15/12/2025	13/02/2026
sodium fluoride	231-667-8	7681-49-4	Acute toxicity – inhalation Acute toxicity – dermal Acute Toxicity - oral Reproductive toxicity Endocrine disruptor for human health	17/11/2025	16/01/2026
Tris[2-chloro-1-(chloromethyl)ethyl] phosphate	237-159-2	13674-87-8	Reproductive toxicity Endocrine disruptor for human health	15/12/2025	13/02/2026

Biosidikuuleminen (mahdollinen hyväksymättä jättämisen kriteereistä poikkeaminen)

Tällä hetkellä ei ole kuulemisia menossa.

Biosidikuuleminen (mahdolliset korvattavat aineet ja poikkeukset)

Scope	Substance name	EC Number	CAS Number	Product type	Consultation start date	Consultation end date
CfS & Derogation	1-(4-chlorophenyl)-4,4-dimethyl-3-(1,2,4-triazol-1-ylmethyl)pentan-3-ol [tebuconazole]	403-640-2	107534-96-3	8	16/12/2025	13/02/2026
CfS & Derogation	formaldehyde released from the reaction products of paraformaldehyde and benzyl alcohol ((benzyloxy)methanol)	-	-	PT06	25/11/2025	26/01/2026
CfS	imidacloprid	428-040-8	138261-41-3	18	10/12/2025	09/02/2026
CfS & Derogation	Silver nitrate	231-853-9	7761-88-8	1, 4, 5, 9	24/11/2025	23/01/2026

Työperäiset raja-arvot (OEL):

Tällä hetkellä ei ole kuulemisia menossa.

POP-asetus:

Tällä hetkellä ei ole kuulemisia menossa.

Muut kuulemiset:

Tällä hetkellä ei ole kuulemisia menossa.

Aimmat kuulemiset, joiden konsultointi- tai kuulemisaika on loppunut, löytyvät nyt ECHA:n sivuilta täältä: https://echa.europa.eu/fi/public-consultations

Aierekisterin (Registry of Intentions)

Aierekisterin rakenne on uudistettu. Kussakin prosessissa (harmonisoitu luokitusehdotus, rajoitus, ja SVHC-tunnistus) aomeet on listattu yhteen tauluikkoon, josta voi seurata aineiden käsittelyn etenemistä sorttaamalla ”staus” -saraketta. Rekisteri löytyy Tietoa kemikaaleista -osiosta https://echa.europa.eu/fi/registry-of-intentions

ECHAn **PACT-työkalun** (public activities coordination tool), jolla välitetään ennakkotietoa, kun viranomainen harkitsee jollekin aineelle riskinvähennystoimia löytyy täältä: https://echa.europa.eu/fi/pact
Ns. RMOA:n (risk management option analysis) lopputulema päivitetään taulukkoon.

ECHAn lehdistötiedotteista ja uutiskirjeestä poimittua:

ECHA adds one hazardous chemical to the Candidate List

The Candidate List of substances of very high concern (SVHC) now contains 251 entries for chemicals that can harm people or the environment. Companies are responsible for managing the risks of these chemicals and giving customers and consumers information on their safe use.
ECHA’s Member State Committee confirmed the addition of 1,1'-(ethane-1,2-diyl)bis[pentabromobenzene] (DBDPE) to the list in its October meeting. The substance has very persistent and very bioaccumulative properties and is used as a flame retardant in various industries. This identification will support the potential restriction work on brominated flame retardants.

Entry added to the Candidate List on 5 November 2025:

Substance name	EC number	CAS number	Reason for inclusion	Examples of uses
1,1'-(ethane-1,2-diyl)bis[pentabromobenzene] (DBDPE)	284-366-9	84852-53-9	Very persistent and very bioaccumulative, vPvB (Article 57e)	Flame retardant

Updated Candidate List reference substance package available for SCIP notifiers

An updated reference substance package that is aligned with the latest inclusion of new hazardous chemicals to the Candidate List is now available for SCIP notifiers.

ECHA recommends companies to import this package to their IUCLID instances and use it when creating SCIP notifications for articles containing the newly added Candidate List substances.

The Candidate List reference substances package for SCIP notifications includes:

- individual reference substance datasets
- a change log of the Candidate List package
- delta package reference substance datasets
- a list of reference substances.

ECHA helping SMEs to comply

Te European Chemicals Agency (ECHA) has launched an updated SME hub on its website to support smaller companies with their duties under European chemicals legislation. Helping SMEs is one of the Agency's core tasks.

The SME hub contains online tools and materials from Member States and ECHA, including an AI-powered virtual assistant pilot. These online resources were presented today at the SME Assembly in Copenhagen, Denmark, held as part of the EU's SME Week.

Mercedes Viñas, ECHA's Director for Submissions and Interaction said: "EHA's strategy underlines the importance of providing tools, advice and support, particularly to smaller companies to help them fulfil their duties under the EU chemical legislation.

"We have met with SMEs and industry representatives to better understand the specific needs that smaller companies have. As a result, we can better address their concerns. We plan to continue engaging with SMEs and their representatives to make sure that we can address their needs in our current and future activities, for example, when designing new tools for industry. The competitiveness of European small and medium-sized enterprises is pivotal to our economy's success and a priority on our agenda."

ECHA is piloting uses of artificial intelligence (AI) in its work, in this case, we want to learn if AI can support SMEs in meeting their obligations under the EU chemicals legislation. This includes, for example, a webinar for SMEs from 22 October featuring AI-generated translations, and a pilot of an AI-powered virtual assistant. Available 24/7 in all EU languages, the assistant helps companies find reliable information about their duties by providing answers based on publicly available resources, including Q&As and other content from ECHA's websites. During the pilot, ECHA will analyse the submitted questions and provided answers, as well as consider user feedback to continuously improve the assistant.

Four substances recommended for REACH authorisation

The European Chemicals Agency (ECHA), to protect health and the environment, recommends that the European Commission adds four substances, including melamine, to the REACH Authorisation List. Once added to the list, companies must apply for authorisation if they wish to continue using the substances.

The recommendation includes the following substances:

- Barium diboron tetraoxide;
- S-(tricyclo[5.2.1.0 2,6]deca-3-en-8(or 9)-yl) O-(isopropyl or isobutyl or 2-ethylhexyl) O-(isopropyl or isobutyl or 2-ethylhexyl) phosphorodithioate;
- Diphenyl(2,4,6-trimethylbenzoyl)phosphine oxide; and
- Melamine.

ECHA has selected these substances from the Candidate List of substances of very high concern (SVHC) for this recommendation because, following the agreed approach, they are of the highest priority.

The inclusion of melamine in the draft recommendation was comprehensively commented on by sectors using the substance during the 2024 consultation period but the decision to include it was made after careful consideration of all the issues.

Ofelia Bercaru, Director for Prioritisation and Integration, said: “When assessing the consequences of including a substance in the Authorisation List, it is important to consider the scope of the legal requirement. In most of its applications, melamine appears to be used as an intermediate, which does not require authorisation under REACH.

“However, applications for authorisation for the remaining uses may potentially create a significant workload for companies and authorities. ECHA is aware of the challenges and considered that balancing the risks posed by melamine with its continued use, requires a policy decision by the Commission and EU Member States.” More information about the reasons for recommending these substances for authorisation and about their uses is available in ECHA’s recommendation and related documents.

Highlights of the November Forum meeting

ECHA’s Enforcement Forum agreed on a new work programme setting out its enforcement priorities for 2026-2027 and started work on new projects.

The Forum adopted its new work programme for 2026-2027, which sets out enforcement priorities and outlines coordinated actions for the next two years. The focus will remain on enforcement on imports, online sales and integrated controls. More specific priorities include classification and labelling and controlling

different risk management measures. There will also be more emphasis on collaboration with enforcement authorities from other sectors.

The Forum, seeking to support enforcement authorities in the long term, established a dedicated task force to further develop its compendium of analytical methods used to monitor restrictions on hazardous substances. The Forum will engage with European bodies or other networks working with analytical methods.

New projects launched

The Forum started work on new projects, including preparation and training for the next EU-wide harmonised enforcement project (REF-15). This project will focus on the safe use of chemicals in workplaces, in co-operation with occupational health and safety inspectors.

Preparations began for the pilot project on requirements of the Prior Informed Consent (PIC) Regulation, aimed at ensuring that exports of hazardous chemicals comply with the rules and are accompanied by the required information.

National enforcement campaigns

The Forum also exchanged experience on national enforcement campaigns, gave steer to its ongoing projects and made plans for advice on the enforceability of restrictions in 2026.

Members reviewed and discussed the results of enforcement projects concluding in 2025 – the EU-wide project on imports (REF-12) and pilot project on poison centre notifications. The final report for REF-12 is planned to be published later this year and the report on the pilot project on poison centre notifications in early 2026.

Biocidal Product Regulation Subgroup (BPRS)

The Forum's BPRS exchanged experiences on national BPR enforcement and gave steer to its ongoing enforcement project, which checks that the labelling of biocidal products is consistent with their Summaries of Product Characteristics. It also contributed to the preparations of training for inspectors. In addition, the BPRS agreed to give enforceability input to ECHA's Biocidal Products Committee on the frequently used phrases on the Summary of Product Characteristics.

The Forum met remotely on 17-21 November and the BPRS on 14 November 2025. The next meetings will be held in March 2026.

ECHA ready to receive reports on microplastics emissions

Companies can start reporting to the European Chemicals Agency (ECHA) their annual microplastics releases under the EU's microplastics restriction. These reporting obligations apply to uses that are exempt

from the EU-wide ban. The first reports must be submitted by 31 May 2026 covering estimated emissions for year 2025.

The latest releases of our chemical data software IUCLID and submission tool REACH-IT support companies in complying with the EU-wide microplastics restriction, which came into force in 2023.

The reporting system, developed in collaboration with stakeholders, ensures standardised and transparent data collection, enabling regulators to monitor emissions and assess the effectiveness of risk management measures. The data may also inform future policy decisions on microplastics.

Reporting obligations

The annual reporting obligation applies to uses of synthetic polymer microparticles (SPMs) that are exempt from the ban, such as in veterinary and human medicines, food additives, in vitro diagnostic devices, and uses at industrial sites. The obligations apply to manufacturers, importers and downstream users alike. Also, suppliers of SPMs and SPMs-containing products are affected under certain conditions.

Companies affected need to prepare the report on annual releases in IUCLID format and submit it to ECHA through REACH-IT. The first deadlines are:

- 31 May 2026 – for manufacturers and industrial downstream users of SPMs in form of pellets, flakes and powders, used as raw material in plastic production at industrial sites; and
- 31 May 2027 – for all other manufacturers and industrial downstream users of SPMs at industrial sites, as well as for suppliers placing products containing SPMs on the market for the first time for specific exempted uses by professionals or the public.

Reports must cover emissions from the previous calendar year. For now, only initial submissions are possible in REACH-IT. Updates will be allowed from the second quarter of 2026.

ECHA has published guidelines, a IUCLID manual, and a video tutorial to help companies prepare and submit their reports. In addition, a pre-filled IUCLID dataset (.i6z) is made available to help users prepare their IUCLID dossiers.

Affected companies are encouraged to familiarise themselves with the reporting requirements and ECHA’s support materials well ahead of the deadlines.

Enforcement Forum finds non-compliance in imported substances, mixtures and products

An EU-wide targeted enforcement project checking imported substances found that one out of three of substances in mixtures was missing a REACH registration. In addition, restricted hazardous substances were present in some of the imported consumer products above the allowed limits.

Inspectors in 29 EEA countries performed 2 603 targeted controls to check imports for compliance with the registration, restrictions and authorisation requirements of the EU chemicals legislation REACH.

Enforcement actions and recommendations

Henrik Hedlund, Chair of the Enforcement Forum's working group, said: "Many inspections were conducted in cooperation with customs and national enforcement authorities, helping us to develop the most appropriate methods for controlling compliance of imported products with EU chemicals legislation. This will strengthen future controls and make them more efficient.

"Through such coordinated enforcement, we protect health and the environment by preventing non-compliant products from entering the EEA market. This also helps to safeguard the European single market from unfair competition, contributing to a level playing field for companies."

Results of the project show the importance of a well-informed and well-designed sampling and targeting strategy for performing enforcement activities. The results also show that importers need to become aware of REACH duties before imports take place. They should acquire analytical reports or other evidence proving compliance with REACH. These and other recommendations are available in the report.

Almost all detected non-compliant products checked before the release for free circulation were either not allowed to enter the EEA market or allowed to enter only after corrective measures were taken.

Registration requirements

When checking substances and mixtures for compliance with registration requirements, inspectors found that one out of three of the checked substances in mixtures was missing the required registration. For substances imported on their own, registration was missing in 7% of the cases. These non-compliance rates are higher than what has been detected in past projects.

The Forum found that importers of mixtures containing unregistered substances often did not know what substances they were placing on the market.

Restriction requirements

Inspectors also checked over 1 300 imported mixtures and consumer products for compliance with REACH restriction requirements. They found that 16% contained restricted hazardous substances breaching the

conditions of the restriction – for example, the substance was present above the allowed concentration, which entails risk to human health. Most controls were on imported jewellery, checking for the presence of nickel, cadmium and lead, but many controls targeted also toys and textiles. The Forum did not see improvement in jewellery compared to earlier findings. The results show that imported jewellery persistently contains restricted heavy metals, especially nickel.

Enforcement authorities also checked REACH authorisation duties for imported substances of very high concern which are subject to authorisation. Inspectors checked 21 such cases, and authorisation was missing or expired in four cases.

The controls in this project were targeted at products where non-compliance was expected to be found. Therefore, the results do not directly reflect the overall non-compliance rate of products imported to the EEA market.

FORUM REF-12 project report: https://echa.europa.eu/documents/10162/17088/ref-12_project_report_adopted_en.pdf/0d86f0e0-4617-26a8-0105-a8acfda499fb?t=1765271600665

ECHA's Member State Committee December meeting highlights

In its December meeting, ECHA's Member State Committee (MSC) agreed to identify n-hexane as a substance of very high concern, SVHC, a first neurotoxic case of equivalent level of concern (ELOC). Another substance, 4,4'-[2,2,2-trifluoro-1-(trifluoromethyl)ethylidene]diphenol and its salts, was identified without the committee's involvement.

ECHA will add both substances to the Candidate List of substances of very high concern in February 2026.

The MSC also discussed ECHA's recommendation of priority substances to be added to the REACH Authorisation List and the draft update of the Community Rolling Action Plan for substance evaluation.

In addition, the committee agreed on the first testing proposal for nanomaterials to request further clarifying studies on its chemical properties.

ECHA observes a fall in hazardous chemicals trade in 2024

Based on the annual data reported by Member States to the European Chemicals Agency (ECHA) under the Prior Informed Consent (PIC) Regulation, the decline is mainly due to reduced volumes of exports and imports of substances containing benzene.

ECHA's annual report on exports and imports of chemicals that are banned or severely restricted in the EU shows that substances containing benzene accounted for approximately 51% (1.1 million tonnes) of total exports and 99% (30 million tonnes) of total imports of PIC chemicals in 2024. In 2023, 64 million tonnes of substances containing benzene were exported, with imports reaching 65 million tonnes. The decrease in

their trade has led to a 97% reduction in overall export volumes and a 53% reduction in overall import volumes.

If substances containing benzene are excluded from the data, the report shows a slight increase in hazardous substance trade. Exports of other PIC chemicals increased by 7% from approximately 1.03 million tonnes in 2023 to 1.1 million tonnes in 2024. Imports of other PIC chemicals rose by 2% from approximately 378 000 tonnes in 2023 to 387 000 tonnes in 2024.

The top traded chemicals were largely similar to previous years, with substances containing benzene, benzene itself and ethylene dichloride (1,2-dichloroethane) dominating both exports and imports.

In 2024, pesticide exports increased by 34% (from approximately 173 000 to 232 000 tonnes), after two consecutive years of decline. The main contributor to this increase was chlorate, which accounted for 24% of the overall rise.

Highlights from December RAC and SEAC meetings

The Committees for Risk Assessment (RAC) and for Socio-Economic Analysis (SEAC) progressed their evaluation of the proposed restriction on PFAS. RAC is expected to adopt its opinion in March 2026 while SEAC will agree its draft opinion for further consultation. RAC also adopted its first harmonised classification and labelling opinion on a new hazard class: very persistent, very bioaccumulative (vPvB).

In their December meetings, RAC and SEAC continued evaluating the EU-wide proposal to restrict per- and polyfluoroalkyl substances (PFAS). Both committees reached provisional conclusions on PFAS manufacturing, while SEAC also concluded on electronics and semiconductors.

Both committees also continued examining the horizontal issues relevant to the entire restriction. These include, for example, concentration limits above which PFAS could be restricted; PFAS management plans; recycling; spare parts; practicality - including enforceability - and monitorability, and whether the proposed restriction is the most appropriate EU-wide measure to address the risks from PFAS.

The tentative plan for the Committees' March 2026 meetings includes:

- Final discussion and adoption of RAC's opinion; and
- Discussion and agreement on SEAC's draft opinion.

The 60-day stakeholder consultation on SEAC's draft opinion is expected to begin soon after the draft opinion has been agreed at the Committee's March meeting.

<u>Harmonised classification and labelling</u>

RAC adopted seven opinions on harmonised classification and labelling, including the classification of 4,4'-methylene bis(dibutyldithiocarbamate) as very persistent, very bioaccumulative (vPvB). This is RAC's first

opinion to address a new CLP hazard class following the 2023 revision of the Classification, Labelling and Packaging (CLP) Regulation.

Table 1. RAC's opinions on harmonised classification and labelling.

Substance	Uses[1]	Existing classification	Proposal by Dossier Submitter	RAC opinion[2]
4,4'-Methylene bis(dibutyldithiocarbamate) (EC 233-593-1, CAS 10254-57-6)	The substance is used in hydraulic fluids, lubricants, greases and release products and metal working fluids. It is used as a lubricating agent but also acts as antioxidant and friction reducer.	No current entry in Annex VI to CLP	vPvB; EUH441 (Germany)	This is the first opinion adopted by RAC for this new CLP hazard class. RAC agreed to the proposal by Germany.
Napropamide (ISO); (2*RS*)-*N*,*N*-diethyl-2-(1-naphthyloxy)propanamide (EC 239-333-3, CAS 15299-99-7)	The substance is an acetamide herbicide widely used in the EU and in Australia. Napropamide inhibits root growth and is used against annual grasses and broadleaf weeds.	No current entry in Annex VI to CLP	Aquatic Acute 1; H400 (M = 1) and Aquatic Chronic 1; H410 (M = 10). (Slovenia)	RAC agreed to the proposal by Slovenia regarding the hazards to the aquatic environment, moreover, RAC agreed to add also Carc. 2; H351.
1,3,4,6,7,8-hexahydro-4,6,6,7,8,8-hexamethylindeno[5,6-c]pyran; [galaxolide]; [HHCB] (EC 214-946-9, CAS 1222-05-5)	This substance is used by consumers, in articles, by professional workers, in formulation of mixture and at industrial sites. This substance is used in washing and cleaning products, biocides, air care products, polishes and waxes, perfumes and fragrances, cosmetics and personal care products	Aquatic Acute 1; H400 Aquatic Chronic 1; H410	To add: Repr. 1B; H360Df (France)	RAC agreed to the proposal by France related to classification for development, however agreed to not classify HHCB for fertility and lactation.
5-Methylhexan-2-one; isoamyl methyl ketone (EC 203-737-8, CAS 110-12-3)	The substance is used in coating products, adhesives, sealants, fillers, putties, plasters, modelling clay and laboratory chemicals. The substance is used by consumers, by professional workers, in formulation or re-packing, at industrial sites and in manufacturing.	Flam. Liq. 3; H226, Acute Tox. 4*; H332	To add: Repr. 2; H360d, to remove Acute Tox. 4*; H332 (Finland)	RAC agreed to the proposal by Finland, except that it was agreed to classify the substance Repr. 1B; H360D.
Beflubutamid (ISO); *N*-benzyl-2-[4-fluoro-3-(trifluoromethyl)phenoxy]butanamide; (*RS*)-*N*-benzyl-2-(α,α,α,4-tetrafluoro-*m*-tolyloxy)butyramide (EC -, CAS 113614-08-7)	Is an herbicide used in winter cereal crops and is mainly effective against annual dicotyledonous weed species, but also against some annual monocotyledonous weeds.	Aquatic Acute 1; H400 (M = 100), Aquatic Chronic 1; H410	To add: Repr. 2; H361d, To retain: Aquatic Acute 1; H400 (M = 100), Aquatic Chronic 1; H410 To add: M = 100 (for Aquatic chronic (Germany)	RAC agreed to the proposal by Germany, except that it was agreed not to classify the substance for toxicity for reproduction. Further RAC agreed on M=10 for Aquatic Chronic 1; H410
2-Amino-2-methylpropanol (EC 204-709-8, CAS 124-68-5)	The substance is used in washing and cleaning products, coating products, plant protection products, cosmetics and personal care products, lubricants and greases, biocides and perfumes and fragrances.	Skin Irrit. 2; H315, Eye Irrit. 2; H319 and Aquatic Chronic 3; H412.	To add Repr. 1B; H360D and STOT RE 2; H373 (liver), to modify Skin Corr. 1; H314 and Eye Dam. 1; H318 and to remove Aquatic Chronic 3; H412. (Austria)	RAC agreed to the proposal by Austria, except that it was agreed to add the following SCLs for Skin corrosion: C ≥ 35 % for skin corrosive category 1 and 5 % < C < 35 % for skin irritant category 2.
Ethers_oxiranes: • Allyl glycidyl ether; allyl 2,3-epoxypropyl ether; prop-2-en-1-yl 2,3-epoxypropyl ether (AGE) (EC 203-442-4; CAS 106-92-3); • Butyl glycidyl ether; butyl 2,3-epoxypropyl ether (BGE) (EC 219-376-4; CAS 2426-08-6); • (tert-butoxymethyl)oxirane [1] (isobutoxymethyl)oxirane [2] (tBGE and iBGE) (EC 231-640-0; 223-303-1; CAS 7665-72-7; 3814-55-9)	The substances share a common glycidyl functionality with a reactive epoxide structural motif. The main identified uses are as intermediates including monomers in polymer preparations. This includes uses also in adhesives, sealants, paints and in coatings. All substances have industrial uses. BGE and tBGE are also used professionally and/or by consumers.	**AGE** has a current Annex VI entry as Flam. Liq. 3; H226, Acute Tox. 4*; H302, Acute Tox. 4*; H332, Skin Irrit. 2; H315, Eye Dam. 1; H318, Skin Sens. 1; H317, Muta. 2; H341, Carc. 2; H351, Repr. 2; H361f***, STOT SE 3; H335 and Aquatic Chronic 3, H412. **BGE** has a current Annex VI entry as Flam. Liq. 3; H226, Acute Tox. 4*; H302, Acute Tox. 4*; H332, Skin Sens. 1; H317, Muta. 2; H341, Carc. 2; H351, STOT SE 3; H335 and Aquatic Chronic 3; H412. **tBGE and iBGE**: No current entry in Annex VI to CLP.	**AGE:** To modify Repr. 1B; H360F, Acute Tox. 2; H330 and Acute Tox. 4; H302. To add ATE = 1.3 mg/L (vapour) for inhalation toxicity and ATE = 305 mg/kg bw for oral. **BGE:** To add Repr. 1B; H360F and Acute Tox. 3; H311, to modify Acute Tox. 4; H332 and Acute Tox. 4; H302. To add ATE = 11 mg/L (vapour) for inhalation, ATE = 778 mg/kg bw for dermal and ATE = 1530 mg/kg bw for oral toxicity. **tBGE and iBGE**: Repr. 1B; H360F. (Sweden)	RAC agreed to the proposal by Sweden, but agreed on slightly different ATE values for **AGE** – ATE = 1.2 mg/L (vapour) for acute inhalation toxicity and ATE = 330 mg/kg bw for oral. Furthermore, RAC agreed to add Acute Tox. 3; H311 (ATE = 740 mg/kg bw) for AGE. **BGE** – ATE = 14 mg/L (vapour) for acute inhalation toxicity, ATE = 780 mg/kg bw for acute dermal toxicity, and ATE = 1500 mg/kg bw for acute oral toxicity.

Occupational exposure limits

RAC adopted its opinion on the scientific evaluation of a limit value for anthraquinone. The Committee derived an exposure-risk relationship (ERR) expressing the excess cancer risk and recommended a non-cancer 8h time-weighted average (TWA) limit to protect against repeated dose adverse effects, primarily kidney changes.

Applications for authorisation

RAC and SEAC agreed on 10 draft opinions on applications for authorisation concerning chromium trioxide.

An updated Draft Community Rolling Action Plan on substance evaluation 2026-2028 published

https://echa.europa.eu/documents/10162/879660/draft_corap_update_2026-2028_en.pdf/01102836-365a-4215-6027-9562c4460235

Mapping of PFAS uses evaluated in the SEAC draft opinion published

https://echa.europa.eu/documents/10162/111425157/draft_use_mapping_pfas_en.pdf/7e36c9e4-6d41-ee24-e8e6-f2f2f6a1483d?t=1762328891993

2.2 ELINTARVIKELAINSÄÄDÄNTÖ

Food Packing Forum:in uutisaiheita:

Food processing equipment

Food processing equipment, from stainless steel pipes to plastic conveyor belts, makes prolonged, repetitive contact with food. Under the mechanical, thermal, and chemical stresses of modern production, chemical components of that equipment can migrate into the food product. These can include migrations of known hazardous chemicals and unknown or untested chemicals, at levels that may be of concern to public health or result in costly recalls.

Our new background article reviews the main contamination pathways into food from processing equipment, the chemicals of concern they can contain, relevant regulatory frameworks, and emerging mitigation strategies: https://foodpackagingforum.org/resources/background-articles/food-processing-equipment

Swiss ordinance on packaging and waste

We submitted comments on Switzerland’s draft amendments to the Ordinance on the Prevention and Disposal of Waste, and a new Regulation on Packaging. FPF sees progress in the proposed legal texts but

identifies an evidence-based need for clearer prioritization of reuse over recycling, stronger chemical safety, and closer alignment with the EU's Packaging and Packaging Waste Regulation (PPWR).

South Korea and Japan publish criteria for recycled content in PET bottles

South Korea’s Ministry of Environment amends Enforcement Decree of the Resource Recycling Act to require 10% recycled PET for plastic beverage bottles made by high-volume fillers and manufacturers starting January 1, 2026; Japan’s Ministry of Economy, Trade and Industry outlines plastic beverage bottle design requirements for certification under Plastic Resource Recycling Promotion Act of 2022 starting January 24, 2026, including minimum 15% recycled PET content.

Study on chemicals of concern lacks transparency

Restricted Substance Lists compiled as attempt to create a harmonized inventory on chemicals of concern used in food contact materials lacks methodological transparency; does not provide details on which lists were reviewed, omits criteria for grouping, misses references.

More breast carcinogens in food contact materials come to light

Food Packaging Forum reruns comparison of potential breast carcinogens list developed by the Silent Spring Institute with updated database on migrating and extractable food contact chemicals (FCCmigex); finds an additional 41 food contact chemicals that are potential breast carcinogens; 6 additional confirmed carcinogens detected in migration studies.

Update of ToMEx – A tool to explore microplastic toxicity

ToMEX 2.0 continues to allow quick upload, assessment, analysis, and visualization of microplastic toxicity data; updated database roughly doubled in size with modest increase in data diversity; most trends remain constant.

FPF submits data to ECHA call for evidence on hazardous chemicals in packaging

Food Packaging Forum (FPF) tailors its datasets to support European Chemicals Agency (ECHA) call for evidence for substances in packaging and packaging waste; data definitively shows 458 chemicals in single use food packaging on the European market, 147 of which have known hazards.

Potential transfer of toxic gluten from biodegradable tableware to gluten-free foods: Implications for individuals with gluten-related disorders

This migration study highlights a particular challenge of biodegradable packaging relevant for consumers affected by gluten-related disorders such as celiac disease: some can release gluten into food in quantities exceeding the 20 mg/kg threshold for gluten-free labeling.

Human internal exposures of bisphenol A and six data-poor analogs predicted by physiologically based kinetic models with multimodal parametrization

Scientists from ETH Zurich emphasize the importance of toxicokinetics in chemical toxicity assessment. Using physiologically based kinetic models, they predict internal exposure levels of bisphenol A (BPA) and six structural analogs following oral administration. They find significant differences in internal concentration. BPS shows the highest levels in blood and testis while BPAF accumulates most in breast tissue.

Microplastics as emerging vectors of combined chemical toxicity: an urgent call for integrative toxicological research

An editorial points out that microplastics challenge traditional toxicological frameworks, which treat physical and chemical hazards separately. Microplastics combine both: they are particles that also contain complex mixtures of plastic chemicals (and can further absorb environmental chemicals). The authors call for a shift in toxicological research and public health policy to reflect the “dual-action toxicity” of microplastics.

Trust and science: the essential elements missing from plastics treaty talks

A Nature editorial argues that scientists should have a formal role in the INC plastics treaty talks – beyond observer status – to provide impartial, evidence-based input that can bridge political divides, as the Scientists' Coalition for an Effective Plastics Treaty is already doing informally.

Food packaging made from seaweed?

New food contact materials (FCMs) are constantly being developed to address health and environmental concerns. Our new background article explores: What can be considered novel? Where do the research and regulations stand? What are questions innovators and their investors might want to consider before scaling up? https://foodpackagingforum.org/resources/background-articles/novel-fcms

Looking for an introduction to the field of food contact materials and health?

If you're new to the field and looking for an overview of the latest science, our updated crash course page is a great place to start. We brought together videos, key numbers from our extensive databases, and relevant resources and references in one place. https://foodpackagingforum.org/resources/food-contact-materials-and-health

EFSA publishes report on micro- and nanoplastics from FCMs

European Food Safety Authority (EFSA) literature review confirms Food Packaging Forum findings that microplastics can be released from food contact materials (FCMs) during use; identifies mechanical stress and fiber shedding as key particle release mechanisms; summarizes methodological shortcomings, data gaps, and recommendations.

European Parliament adopts final proposals to improve chemical assessments

European Parliament adopts final text of ‘one substance, one assessment’ package; three proposals aim to improve and streamline chemical safety assessments across the EU; now needs to be adopted by European Council of Ministers.

Packaging waste data from the EU and California

In 2023, the EU generated a total of 79.7 million tonnes of packaging waste; equates to 177.8 kg per person; of which 120.0 kg were recycled; California estimates 8.5 million tonnes of single-use packaging waste in landfills; most waste in EU and California made up of paper and plastic.

Bisphenols under continued regulatory scrutiny

India issues a draft regulation proposing the ban of PFAS in the manufacture of food contact materials (FCMs); FCMs made with polycarbonate or epoxy resins must be BPA-free; effective December 10, 2025; California requests information on p,p’-bisphenols for possible listing in Proposition 65 as toxic to reproduction; includes most common bisphenols in food packaging production; submissions open until December 1, 2025

U.S. Plastics Pact launches second phase of Reuse in Retail Initiative

U.S. Plastics Pact, WRAP, and Upstream announce scoping phase of Reuse in Retail Initiative; aims to help brands, retailers, and reuse providers identify feasible applications for reuse in retail; initiative will conclude in 2028 with launch of reuse program in U.S.

Ultra-Processed Foods and Human Health

Ultra-processed foods (UPFs) are associated with numerous non-communicable diseases, according to global nutrition experts. A three-part series published in The Lancet summarizes the evidence for UPFs' impact on human health, calls for coordinated regulatory action to halt and reverse UPF production, and outlines a vision for a safer food system that improves access to fresh and minimally processed foods.

A statistical workflow for analyzing the untargeted chemical exposome and metabolome in epidemiologic studies using high-dimensional mixture methods

Humans are exposed to complex mixtures of known and unknown chemicals, making it technically challenging to identify risk factors and cumulative health risks. Scientists developed a statistically powerful method to assess the health impacts of chemical mixtures and pinpoint chemical drivers, while maintaining data resolution or interpretability.

The Human Plastiphere: A Bioparticulate System Challenging Microplastic Risk Assessment and Governance

Researchers introduce the concept of the human plastisphere — "a bioparticulate system composed of nonendogenous plastic particles that accumulate, distribute, and interact with host tissues." This new conceptual framework recognizes that persistent microplastics integrate into human tissue, becoming part of a biologically active system. The framework aims to advance science from mere detection toward "health-relevant, mechanistically grounded, and policy-actionable solutions."

Read more

2.3 BIOSIDIT, KASVINSUOJELUAINEET JA LANNOITTEET -

ECHA's opinion on ethanol postponed to 2026

The European Chemicals Agency's (ECHA) Biocidal Products Committee (BPC) concluded its discussions today on the approval of ethanol as an active substance in disinfectants without adopting an opinion. The Committee will resume its work in February 2026 and aims to adopt the opinion later that year.

The BPC discussed the approval of ethanol for use in hand and general disinfectants but was unable to adopt an opinion on its potential hazards and alternatives.

Due to the lack of consensus, the Committee further postponed the opinion making. The final opinion is not expected before May 2026, after which the European Commission will take the decision.

New tool to support biocide risk assessment for bees

A new online tool called B-risk for biocides helps companies, scientists and authorities assess the risks of biocides to bees. The tool supports compliance with ECHA's 2024 Bee Guidance, which will apply from February 2026.

The B-risk for biocides tool has been developed as a collaborative effort under the 'one substance, one assessment' approach. It is an extension of the European Food Safety Authority's (EFSA)'s B-risk tool — originally designed for plant protection products — and adapted now to the specific needs of biocidal products, particularly insecticides.

The tool helps users to conduct risk assessments under the Biocidal Products Regulation (BPR), supporting bee health and biodiversity across Europe.

Key benefits of B-risk for biocides include:

- Biocide-specific exposure assessment;
- A user-friendly, step-by-step interface that performs complex calculations automatically;
- Alignment with EFSA's 2023 Bee Guidance for pesticides, ensuring shared scientific principles; and
- An integrated user manual for clear guidance at every assessment stage.

How to access: B-risk tool is available through ECHA's Support web pages. From there, users will be redirected to EFSA's R4EU platform, where the tool is hosted. It can be accessed directly online — no installation is required. However, registration on the R4EU portal is necessary to gain access, and EFSA's terms of use must be accepted.

Highlights from November BPC meeting

ECHA's Biocidal Products Committee (BPC) adopted four opinions on active substances and three on Union authorisations.

The BPC, in its November meeting, adopted the following opinions on active substances:

- supporting the renewal of Muscalure for product-type 19 (repellents and attractants); and
- not supporting approval of Bromochloro-5,5-dimethylimidazolidine-2,4-dione for product-types:
    - 2 - disinfectants and algaecides not intended for direct application to humans or animals;
    - 11 - preservatives for liquid-cooling and processing systems; and
    - 12 - slimicides.

The BPC proposes non-approval of Bromochloro-5,5-dimethylimidazolidine-2,4-dione for all three product-types because of a data gap concerning mutagenicity. Due to this data gap, the Committee could not conclude whether the active substance poses an acceptable risk to human health nor whether it meets the substitution or exclusion criteria.

On ethanol, the committee postponed its opinion until 2026.

The committee adopted the following three opinions supporting Union authorisations for:

- a biocidal product family containing Active chlorine released from hypochlorous acid for product-types 2, 4 (food and feed area) and 5 (drinking water);
- a biocidal product family containing Active chlorine released from sodium hypochlorite for product-type 4; and
- a biocidal product family containing Hydrogen peroxide for product-types 2 and 4.

In addition, the BPC adopted the following two opinions on post-authorisation data submitted for:

- a biocidal product family containing Permethrin;S-Methoprene for product-type 18 (insecticides, acaricides and products to control other arthropods); and
- a biocidal product family containing L-(+)-lactic acid for product-type 2.

More information about the committee's conclusions is available in the annex.

The European Commission together with the EU Member States will take the final decisions based on the BPC's opinions.

2.4 PESUAINEET JA KOSMETIIKKA -

2.5 KANSALLINEN LAINSÄÄDÄNTÖ JA VALVONTA

Tukes ja kemikaalineuvonta informoi:

Tukes testautti paloikkunoita – täyttivät vaatimukset

Turvallisuus- ja kemikaalivirasto (Tukes) testautti puurakenteisia, EI30-paloluokiteltuja ikkunoita valvontaprojektissa. Tavoitteena oli tarkastella, vastasiko ikkunoiden paloluokka valmistajan ilmoittamaa. Kaikki testatut ikkunat täyttivät vaatimukset ilman havaittuja puutteita.

Valvontaprojektin tausta ja tavoitteet

Valvontahankkeessa selvitettiin, täyttävätkö EI30-paloluokan puurakenteiset ikkunan ilmoitetun palokestoajan. Paloluokassa EI30 tiiveyden (E) ja eristävyyden (I) tulee säilyä vaaditun 30 minuutin ajan testistandardin EN 1634-1:2014 + A1:2018 ja paloluokitustandardin SFS-EN 13501-2 mukaisesti. Testeihin valittiin kuuden eri valmistajan puurakenteisia paloikkunoita. Tuotteita käytetään yleisesti asuinrakentamisen kohteissa, joissa on palo-osastointivaatimus, esimerkiksi rakennettaessa lähelle toisen

kiinteistön asuinrakennusta. Myös rakennuskohteen sisäiset palo-osastot voivat tuoda vaatimuksia ikkunoiden palonkestolle.

Miten paloikkunoita testattiin?

Jotta tiiveysvaatimus polttokokeissa täyttyy, ei rakennusosaan tai rakennusosan ja sitä ympäröivän rakenteen väliin saa kokeen aikana syntyä rakoja, eikä liekkejä saa esiintyä tulen vastakkaisella puolella. Eristävyysvaatimuksen täyttyminen todetaan lämpötilamittausten avulla. Lämpötilat mitataan palotilan vastakkaiselta puolelta koekappaleen pinnalta.

Paloikkunoiden suoritustasoilmoitus ja CE-merkintä perustuvat kahteen rakennustuoteasetuksen mukaiseen harmonisoituun standardiin. EN 14351 1 -standardissa esitetään vaatimukset normaalikäytön ominaisuuksille ja EN 16034 -standardissa palo-ominaisuuksille.

Testauksen suoritti Tampereen yliopiston palolaboratorio. Testaukseen valittujen ikkunoiden palonkestävyys määritettiin EN 1634-1 -standardin mukaisesti ja paloluokitus määriteltiin EN 13501-2 -standardin mukaisesti.

Tulokset

Kaikki testatut ikkunat täyttivät tiiveydelle (E) ja eristävyydelle (I) asetetut vaatimukset. Tulokset osoittavat, että testautetut paloikkunat vastasivat valmistajiensa ilmoittamaa suoritustasoa.

Huolto ja käytönaikainen kunnossapito tärkeää

Jotta paloikkunat täyttävät sille asetetut vaatimukset myös pitkään rakennuskohteen käyttöönoton jälkeen, on tärkeää seurata ikkunoiden kuntoa säännöllisesti. Niin paloikkunoiden kuin palo-ovienkin kunto ja toiminta on hyvä kirjata kiinteistön huoltokirjaan määräajoin tarkastettavaksi.

Komissio pyytää palautetta kehittyneitä materiaaleja koskevasta EU-lainsäädäntöhankkeesta

Komissio on käynnistänyt kannanottopyynnön ja julkisen kuulemisen, joka koskee tulevaa EU-säädöstä kehittyneistä materiaaleista. Hanke on osa komission laajempaa toimintasuunnitelmaa, jonka tavoitteena on vahvistaa EU:n kemianteollisuuden kilpailukykyä. Kehittyneet materiaalit ovat tarkoituksella suunniteltuja ja valmistettuja materiaaleja, joilla on innovatiivisia ominaisuuksia ja toimintoja. Niitä voidaan käyttää monenlaisissa tuotteissa puettavista elektronisista laitteista sähköajoneuvoihin. Komission mukaan säädös on ratkaisevan tärkeä EU:n teollisen johtajuuden, strategisen autonomian ja kilpailukyvyn kannalta.

Kehittyneet materiaalit ovat välttämättömiä EU:n siirtymiselle kestävään ja kilpailukykyiseen talouteen. Niille on ominaista uudet tai parannetut ominaisuudet ja tarkasti suunnitellut rakenteelliset piirteet, ja niillä on tärkeä rooli esimerkiksi puhtaan ja syvän teknologian sekä puolustus- ja avaruusteollisuuden aloilla.

Kehittyneitä materiaaleja koskeva lainsäädäntöhanke perustuu komission helmikuussa 2024 antamaan tiedonantoon "Kehittyneet materiaalit teollisen johtoaseman edistämiseksi". Sen tavoitteena on yhdenmukaistaa EU:n ja jäsenvaltioiden tutkimus- ja innovointiprioriteetit ja -tavoitteet kehittyneiden materiaalien osalta, vahvistaa eurooppalaista kehittyneiden materiaalien ekosysteemiä, sekä lisätä investointeja.

Säädöksen tavoitteena on luoda puitteet kehittyneiden materiaalien innovoinnin ja markkinoille tulon nopeuttamiselle. Samalla se pyrkii lisäämään tuotantokapasiteettia EU:ssa ja vähentää riippuvuuksia strategisen autonomian saavuttamiseksi. Tämä edistäisi Euroopan kilpailukykyä ja selviytymiskykyä haastavassa geopoliittisessa tilanteessa sekä globaalissa kilpailussa uusista puhtaista ja digitaalisista teknologioista.

Julkisen kuulemisen tarkoituksena on kerätä palautetta yritysten ja muiden sidosryhmien EU:ssa kohtaamista keskeisistä haasteista säädöksen valmistelun tueksi. Myös tutkijoilta sekä poliittisilta päättäjiltä halutaan palautetta. Kuuleminen antaa pohjan aloitteeseen liittyvälle vaikutustenarvioinnille.

Kannanottopyyntö ja julkinen kuuleminen ovat avoinna 13.1.2026 saakka komission "Kerro mielipiteesi" -portaalissa.

Komission odotetaan julkaisevan kehittyneitä materiaaleja koskeva säädösehdotus vuonna 2026.

Juomavesidirektiivin positiivilistoille hakemisesta voi ilmoittaa vuoden 2026 alusta lähtien

Vuoden 2026 alusta alkaen hakija voi lähettää ennakkoilmoituksen aikomuksesta tehdä hakemus juomavesidirektiivin positiivilistoille. Uudet juomavesidirektiivin vaatimukset tulevat voimaan 1.1.2027 alkaen.

EU:n uudistetussa juomavesidirektiivissä on positiivilistat, eli listat aineista, joita saa käyttää talousveden kanssa kosketuksissa olevissa materiaaleissa. Hakijan pitää tehdä ilmoitus aikomuksesta hakea aineen lisäämistä positiivilistalle 12 kuukautta ennen varsinaisen hakemuksen lähettämistä. Ilmoituksia aikomuksesta tehdä hakemus voi jättää 1.1.2026 alkaen. Ilmoitus tehdään Euroopan kemikaalivirasto ECHA:lle.

<u>Uudet vaatimukset tulevat voimaan vuoden 2027 alusta</u>

Uudet juomavesidirektiivin vaatimukset tulevat voimaan 1.1.2027 alkaen, ja siitä alkaen voi myös lähettää varsinaisia hakemuksia aineiden lisäämiseksi positiivilistoille.

Kaikki aineet on lisätty ensimmäisille positiivilistoille määräajaksi ja viimeistään 18 kuukautta ennen määräajan päättymistä pitää lähettää hakemus, jos haluaa aineen pysyvän listalla ilman katkoksia.

<u>Miten hakijan tulisi toimia?</u>

Selvitä ensin, onko käyttämäsi aineet positiivilistalla ja mikä määräaika niillä on hakemuksen tekemiselle.

Positiivilistoille kannustetaan tekemään vain yksi yhteinen hakemus samasta aineesta.

Ennakkoilmoitukset aiotuista hakemuksista julkaistaan Euroopan kemikaalivirasto ECHAn verkkosivuilla ja niiden avulla voi löytää muita toimijoita tekemään yhdessä hakemusta. Hakemisesta kiinnostuneiden kannattaa alkaa seurata ilmoituksia heti vuodenvaihteen jälkeen.

Positiivilistoilla on määritelty mm. seuraavia asioita orgaanisille lähtöaineille ja sementtimäisten materiaalien orgaanisille ainesosille: tekninen käyttötarkoitus, juomaveden kanssa kosketuksiin joutuvat materiaalit/geneerisen ainesosan luokka, käyttöehdot. Metallisille materiaaleille on määritelty epäpuhtauksien enimmäispitoisuudet, olennaiset tuoteryhmät ja käyttöehdot. Käyttöehto voi esimerkiksi olla maksimi jäämäpitoisuus lopullisessa materiaalissa. Kaikkien ainetta käyttävien valmistajien kannattaa osallistua yhteisen hakemuksen laatimiseen, jotta käyttöehdot ja listoilla sallittu materiaalin käyttötarkoitus ovat varmasti omiin käyttöihin sopivia.

Tarkempia ohjeita hakijoille löytyy ECHAn verkkosivuilta.Lisätietoa on saatavilla myös mm. ECHAn webinaaritallenteesta.

Lisätietoa juomavesidirektiivistä ja talousvesituotteista yleisellä tasolla on saatavilla Tukes Kampus -koulutuksesta Talousvesituotteiden turvallisuus.

Lainsäädäntö:

Juomavesidirektiivi: https://eur-lex.europa.eu/legal-content/FI/TXT/?uri=CELEX:32020L2184&qid=1715940623937

Komission täytäntöönpanopäätös (EU) 2024/367: https://eur-lex.europa.eu/legal-content/FI/TXT/?uri=OJ:L_202400367

Komission delegoitu asetus (EU) 2024/369: https://eur-lex.europa.eu/legal-content/FI/TXT/?uri=OJ:L_202400369

Komission täytäntöönpanopäätös (EU) 2024/365: https://eur-lex.europa.eu/legal-content/FI/TXT/?uri=OJ:L_202400365

3. KOULUTUKSET JA SEMINAARIT -

4. LIITTEET

Lainsäädäntökatsaus EU:n ja Suomen osalta (EU:n Official Journal ja FINLEX ®)

Hyvää uutta vuotta 2026! Terhi Kuljukka-Rabb