# PFAS RESTRICTION PROPOSAL

Customer Update – ACLAR



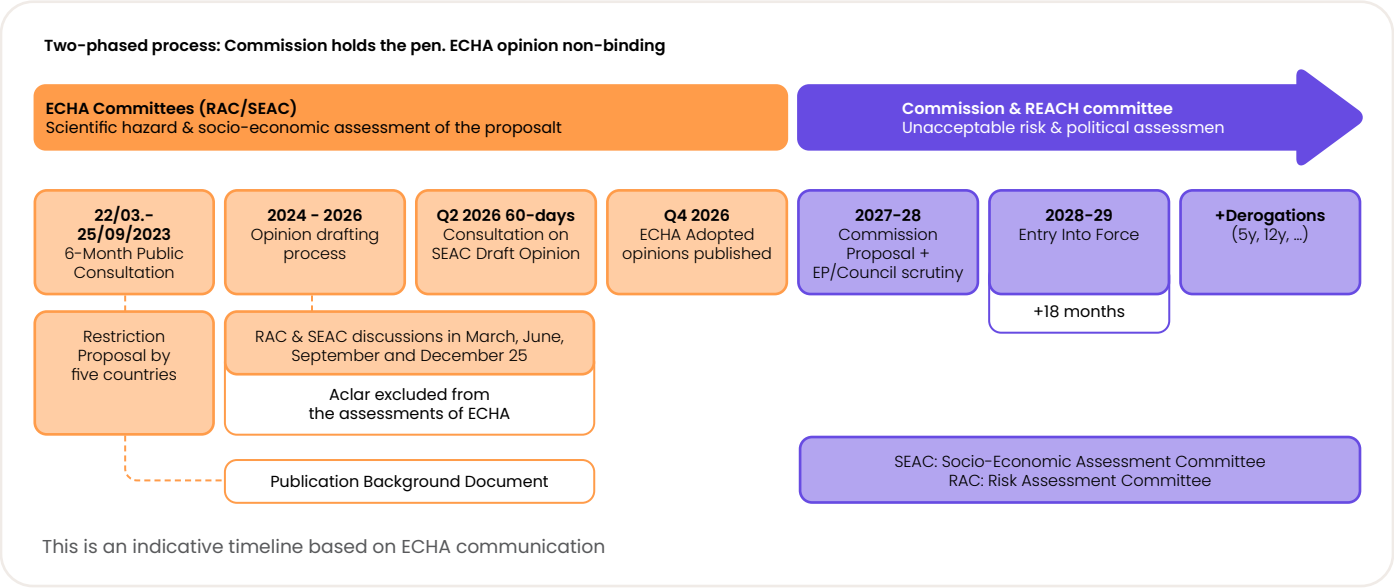
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## Summary

The EU PFAS restriction remains a proposal under the REACH framework. No substances are banned today. Aclar currently falls within the proposed scope only due to the chemical-structure-based PFAS definition, not because of demonstrated risk to human health or the environment. Final regulatory decisions will be taken by the European Commission following completion of the ECHA assessment process.

## How the decision is made

The PFAS restriction follows a two-phase process. First, ECHA committees — the Risk Assessment Committee (RAC) and the Socio-Economic Assessment Committee (SEAC) — assess scientific and socio-economic aspects of the proposal. Their opinions are advisory and non-binding. Second, the European Commission drafts and adopts the regulation, determining scope, derogations, transition periods and implementation. In doing so, the Commission may consider a range of inputs, include RAC and SEAC opinions, and the Background Document, which reflects the position of the five proposing Member States.




This is an indicative timeline based on ECHA communication

## The eight sectors

In August 2025, ECHA confirmed that it could not complete a detailed sector-specific assessment for eight sectors, including Other Medical Applications (such as pharmaceutical packaging). These sectors remain formally within the scope of the proposal, but without a full scientific opinion covering risks, alternatives or socio-economic impacts. The European Commission will decide whether to request further assessment, regulate without detailed ECHA input, or remove some or all of these sectors from scope. The outcome remains open.

## What this means for Aclar customers

Aclar has a long history of safe use and is regulated by the US FDA and European Medical Agency. It is not bioaccumulative or toxic, and has controlled end-of-life management practices. There is no automatic ban following the publication of RAC or SEAC opinions. Regulatory certainty will only be achieved during the Commission phase, where final decisions on scope and derogations are taken.

This document reflects the regulatory status as of January 2026 and is provided by Solstice for information purposes only. It does not constitute legal, regulatory and compliance advice

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000000101-OP-EN | 441DPH | 06/26