

PFAS: What's next?

About three years ago, five EU member states submitted a formal proposal to ECHA for a broad restriction on PFAS. Now, ECHA's two influential committees, the RAC and the SEAC, have published their reports on the matter.

We provide a summary of what the ECHA experts state in their comprehensive reports and what the next steps are.



PFAS – a topic with many unknowns

Over the past three years, the proposal to restrict PFAS (per- and polyfluoroalkyl substances) has been reviewed by two expert committees at ECHA: the Risk Assessment Committee (RAC) and the Committee for Socio-economic Analysis (SEAC). The proposal was very extensive because it covered thousands of individual substances with a wide range of uses across various sectors. After a record number of comments were received during the public consultation, the preparation of the

opinions took an unusually long time.

Both committees have expressed support for the proposal

To put it briefly: The ECHA Risk Assessment Committee (RAC) not only supports the proposal but is even inclined to impose certain stricter requirements.

The proposal provided for a general ban alongside numerous exemptions for various industries and applications. The RAC Opinion notes that, with regard to reducing emissions, a complete ban is considered more effective than a ban with derogations. The further decision-making process will have to determine to what extent temporary or permanent special rules for certain sectors or uses will be reflected in the legal text.

In addition to the Risk Assessment Committee (RAC), another ECHA committee was tasked with reviewing the proposed restriction on PFAS. The Committee for Socio-economic Analysis (SEAC) is responsible for assessing the socio-economic impacts of the proposed restriction.

With regard to use-specific derogations, the SEAC opinion is generally less critical than the RAC opinion. The SEAC clearly states that a total ban without use-specific exemptions does not strike

a sufficient balance between benefits and costs for society. The unavailability of substitutes was also taken into account. However, the SEAC experts are somewhat cautious in their assessment of the proposed exemptions and frequently comment that they lack sufficient information to make a recommendation to decision-makers, or they assess certain exemptions as “likely justified” or “partially justified.” The SEAC even acknowledges that further derogations not mentioned in its opinion may be necessary for certain categories (or subcategories) of use in order to ensure that the PFAS restriction is proportionate; however, uncertainties regarding the data available prevent the SEAC from specifying such additional exemptions.

One gets the impression that both the RAC and the SEAC are passing on a significant portion of the uncertainties surrounding this issue—which likely stem not least from the unusual breadth and versatility of PFAS applications—to the next higher decision-making body.

Many questions remain unanswered

It seems somewhat puzzling that while both expert reports mention the issue of inadequate analytical methods, they readily consider it solvable and do not fundamentally question the feasibility of such a restriction. Yet the RAC itself states that the current shortcomings regarding sampling, sample preparation, and analytical methods represent a major source of uncertainty (“major impact”) with regard to enforcement and monitoring. It remains to be seen whether the optimistic assessment by both committees—that these problems and challenges are solvable—will indeed prove accurate.

A key aspect of the assessment is the availability of alternative substances and their risk profile. It can be assumed that comments from industrial users highlighted the limited availability of alternatives. The two expert reports provide little indication of the extent to which this feedback from industry was actually taken into account in the opinion papers. The RAC Opinion notes that only limited information was available regarding the hazards and risks posed by alternative substances. Particularly with regard to polymeric materials, it was often not possible to conduct a full life-cycle assessment, as would be appropriate. Thus, whether certain alternative substances actually offer advantages over PFAS by being less hazardous is often not reliably substantiated. The RAC itself assesses this uncertainty as a factor of moderate significance (“moderate impact”).

What both reports have in common is that they contain only brief assessments of the so-called “eight additional sectors,” which were added by the authors of the restriction proposal only at a later stage. There is no mention in either of the ECHA reports of a general derogation for polymeric PFAS, which some stakeholders had hoped for.

The SEAC Opinion is a draft on which interested parties may comment until May 25, 2026. This public consultation and the published opinions are available on the ECHA website.¹

Was is Switzerland doing?

The Federal Office for the Environment (FOEN) emphasizes on its dedicated website² that, due to the risks associated with them, PFAS should only be used for purposes for which no alternatives have yet been found. From the perspective of industrial users, however, such alternatives are rarer than is generally assumed. It is simply not that easy to replicate the outstanding performance characteristics of PFAS—such as temperature resistance, chemical resistance, and durability—using other substances. The FOEN further acknowledges that for many PFAS, the effects on humans and the environment are “less well known” (which is likely an understatement; for quite a few PFAS, virtually nothing is known). A definitive statement on how the Swiss Confederation would position itself regarding the EU’s potential blanket ban on PFAS is currently hard to come by.

One thing seems clear, however: if the EU’s blanket ban on PFAS comes into effect, Switzerland will not remain unaffected. It is still unclear what measures Switzerland would adopt and to what extent it would follow suit. Regardless of this, Swiss companies would be affected, as the EU remains the largest export market for the Swiss economy.

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With our [services](#), we advise and support our clients in all matters relating to safety data sheets, labelling of chemicals, product notifications according to the Swiss ChemO (RPC notifications) as well as according to Annex VIII to the CLP Regulation ([Poison Centre Notifications, PCN](#)).

Our [C³ ChemComplianceCheck](#) is a preventive assessment of operational chemical safety. In line with the motto “act instead of react,” weak points are identified before official orders are issued or damage occurs.

¹ <https://echa.europa.eu/de/restrictions-under-consideration/-/substance-rev/72301/term> (accessed on April 2, 2026)

² <https://www.bafu.admin.ch/de/pfas-chemrvv> (accessed on April 2, 2026)

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