



POSITION PAPER

Towards a truly simplified REACH

Key recommendations from the textile industry

APRIL 2025

The textile industry, represented by EURATEX, welcomes any meaningful effort to simplify the most complex chemicals legislation in the world and calls for the Commission to create a **more efficient** and **coherent regulatory chemicals framework** that should focus on the competitiveness and innovation of the EU industry.

Simplifying REACH is clearly welcomed by the textile industry if it also means:

- **reducing the administrative burden for companies and SMEs and not only for authorities;**
- **providing greater long-term legal and investment certainty;**
- **engaging in dialogues involving industry and authorities, bringing in efficient results.**

This will increase **transparency** and **predictability** for companies, and reduce the overall workload for both authorities and industry as a result of the efficiency gains. This will also contribute to **retaining key industries and businesses from relocating outside of the EU.**

For this to be achieved, EURATEX outlines the key recommendations from the textile industry for a simplified REACH that should:

1. Rely on actual **scientific and risk-based data** and avoid any generic hazard-based approach;
2. Facilitate **information exchange** along the value chain;
3. Identify **harmonized and validated test methods** and update regulatory requirements based on scientific progress;
4. Apply **targeted restrictions** instead of the dynamic link between CLP and REACH;
5. Allow **adequate timing** for industry to apply their legal obligations when a SVHC is included in the Candidate list;
6. Ensure a **level playing field** for enforcement and enforceability.

1. Rely on actual scientific and risk-based data and avoid any generic hazard-based approach

Especially for chemicals legislation, data, evidence and scientific proof are key. It is of utter importance for the industry to have sufficient time to gather data, conduct the necessary studies and tests to be able to meaningfully contribute to the legislative process.

Currently, in addition to the already existing Restrictions Roadmap, the Commission is considering the inclusion of the Essential Use Concept (EUC) or the extension of the Generic Risk Management Approach (GRA) under the REACH revision. Hazard-based restrictions undermine the critical need for detailed risk assessments of substance-specific exposure, potentially resulting in unjustified restrictions on substances that are already proven to be safely used. This approach would create additional burdens and would require unnecessary testing from companies and SMEs, who are already struggling with increasing compliance-related costs possibly causing disruptions in the supply chain.

The PFAS example is the perfect illustration that the GRA-based ban does not adequately allow for exemptions particularly in professional uses or technical applications. The ECHA RAC & SEAC had to create a special group for technical textiles where they will separately discuss and assess some PFAS applications in different industry sectors. This shows that exemptions for special uses are always needed and that the GRA is not suitable.

Therefore, if clear criteria to classify a substance in a hazard category are not added, under science-based risk assessment, and if the GRA and the EUC are further applied, the industry will continue facing regulatory uncertainty and will never have legal predictability to enable R&D to identify and develop safe alternatives.



EURATEX RECOMMENDATIONS

- Maintain a risk-based approach for the restriction procedure that allows adequate risk management.
- Avoid regulatory actions like the restriction or authorization of hazardous chemicals that has been proven to be safe once in the product.

2. Facilitate information exchange along the value chain

The textile industry is a downstream user for the chemical industry in the global textile value chain. The textile industry does not use chemical substances but rather chemical products, which are made of substances and mixtures. The substances present in the chemical products are identified through their safety data sheets (SDS). However, challenges remain regarding the global harmonization and completeness of SDS, which can sometimes make it difficult for the textile industry to have access to consistent and comprehensive information.

For example, restrictions are, in some cases, imposed below the reporting thresholds of the SDS. There are also substances that are restricted but not necessarily classified, particularly those based on grouping (e.g. PFAS). These are not reported in SDS even if restricted. This gap between restrictions and reported information through SDS needs to be addressed.

On top of the already mentioned challenges, the Commission is considering to facilitate cross value chain communication by tasking ECHA to resume its work on the extended SDSs. Extended SDSs are around 50 to 60 pages and they include exposure scenarios for every use that is registered. Complex extended SDSs can, therefore, unlikely reduce burdens for companies.

The textile industry is very much in favour of modernising the system to ensure effective communication along the value chain. But, this needs to guarantee the regulatory coherence. The textile industry also welcomes ECHA to work on the supply chain requirements when there is a real centralisation and a clear recognition.



EURATEX RECOMMENDATIONS

- Simplified, digitalised and globally harmonised Technical Dossiers and SDS need to be provided by the chemical industry in order to facilitate information exchange in value chain.
- Full interoperability of data exchange needs to be ensured to make information transmission on chemicals more efficient.

3. Identify harmonized and validated test methods and update regulatory requirements based on scientific progress

In case there are any tests to be performed at the finished product stage, it is technically burdensome for the textile industry to do so, due to the number of chemical substances involved and to the missing test methods for the textile itself. Some chemical substances used, for example, are not intended to remain until the finished product stage. They are, therefore, not detectable in the final product.

It is important that new chemical restrictions include feasible thresholds and are accompanied by validated test methods that can be performed globally, in a reliable and affordable way. Thresholds should also be regularly evaluated and updated based on the progress of analytical techniques.

For instance, the new, updated testing method to target PFAS in textiles, also applicable to PFHxA/C6, is making the textile industry struggle with the restriction limits. Recently established for PFHxA and C6, the existing thresholds are not aligned with the upcoming revised version of the standard (EN 17681-1:2025)¹.

With the new method, even unintentional cross-contamination could result in detectable levels above the established (PFHxA) and proposed (PFAS) thresholds, being mistakenly interpreted as intentional use of PFAS, making compliance and enforcement even more difficult. This particularly affects recycled materials, where the new PFAS testing method frequently results in exceedances of the existing legal limits – effectively leading to a de facto ban on textile recycled materials.

Additionally, the lack of test methods for newly regulated substances/substance groups makes it difficult to prove that the textile is compliant. Therefore, any restriction should only be valid in conjunction with a test method. This ensures security for both companies and authorities.



EURATEX RECOMMENDATIONS

- Standardizing analytical methods for the development of technical dossiers and test product compliance is essential to obtain reproducible, high-quality results and reliable assessments.
- If new or additional test methods are introduced, it is necessary to evaluate their impact on existing thresholds and allow sufficient time for industry to adapt.

[1] EN 17681-1 Textiles and textile products - Per- and polyfluoroalkyl substances (PFAS) - Part 1: Analysis of an alkaline extract using liquid chromatography and tandem mass spectrometry," which replaces the previous methanol extraction with an additional alkaline hydrolysis.

4. Apply targeted restrictions instead of the dynamic link between CLP and REACH

One of the biggest concerns of the textile industry is the “dynamic link” proposed in certain restrictions under REACH.

CLP is the legislation dealing only with the classification of substances, which doesn't include any risk assessment. REACH, however, covers the registration, evaluation, authorisations and restrictions of chemical substances. REACH is also based on extensive risk assessments and detailed information on the safe use of chemical substances.

An example from the textile industry is the use of modern textile dyes. Dyes which are engineered to bond with fibers, could be classified as skin sensitizers even when their sensitizing properties disappear once bound to textiles. Despite their strong safety record, many dyes and chemicals that have been widely used in textile manufacturing for decades and are currently present in textile waste could be legally restricted in the future through the dynamic link.

The dynamic link, that would be put in place between REACH and CLP, would prevent stakeholders from being engaged in the restriction process and from proving the safe use and lack of alternatives. It would also prevent any discussion on proper threshold levels or test methods. Restrictions should cover substances that pose a risk to the environment or the consumer, but this is not identical to the CLP classification of the free substance before it bonds with the textile.



EURATEX RECOMMENDATIONS

- It is essential to ensure clear separation between REACH and CLP legislation and avoid automatic triggers between the two legislations.
- Establish a Master List of relevant substances as initial scope to facilitate compliance for authorities and economic operators.
- Include a “smart-link” to the restriction instead of a dynamic link with CLP.

5. Allow adequate timing for industry to apply their legal obligations when a SVHC is included in the Candidate list

Once a substance is identified as Substance of Very High Concern (SVHC), it is included in the Candidate List. Importers and producers of articles must notify ECHA if their articles contain a Candidate List substance within six months from the date it has been included in the list if the requirements under Article 7(2) are fulfilled. For this to happen, importers and producers need to get the necessary information on the substances present in their articles and their concentration from actors up in their supply chain, such as suppliers of substances and mixtures and suppliers outside the EU.

It is, therefore, unreasonable that the obligation to provide information on SVHC under Article 33 of REACH applies to articles immediately from the inclusion of the substance in the Candidate List. Textile importers and manufacturers need sufficient time to investigate whether a SVHC is present as residue in the chemicals used throughout the global textile value chain.

Article 7, for example, gives a transition period for the registration and notification of substances in articles once the substance is identified as SVHC, however, article 33 doesn't provide any transition period. A transition period would definitely be necessary for articles' manufacturers and importers (especially SMEs) to perform their extensive data collection to obtain the information from upstream suppliers in the global value chain, especially if they are based outside of the EU. This would enable the communication of reliable information to the downstream actors and consumers.

In addition to that, the candidate list was extended three times by ECHA last year. This leads to legal uncertainty and lack of predictability for the industry and creates extra administrative burden and costs, especially for SMEs.



EURATEX RECOMMENDATIONS

- Addition of substances to the Candidate List should only be done once a year, on a fixed date.
- Inclusion of a transition period of one year, from which the information obligation for articles applies.

6. Ensure a level playing field for enforcement and enforceability

The actions promised by the European Commission to revise the REACH framework and provide clarity on PFAS, and the expected new “Chemicals Industry Package” should take into account the competitiveness of the European industry, and tackle any unfair competition from non-EU countries. In particular, chemicals and products coming from outside of the EU should abide by the same rules in place for chemicals and articles in the EU, notably regarding the protection of the environment and human health.

The currently pending skin sensitizers restriction proposal, which may cover over 1000 substances due to the dynamic link between REACH and CLP, is a very good example of the problems that enforceability is facing. Such a broad scope is not manageable by enforcement authorities. It would also be an unreasonable burden for compliance verification, not only for industry but for market surveillance authorities, and would have strong negative consequences to recycling and circular economy goals.

This restriction can only be effective if the scope remains in line with the aim of the restriction, meaning to ban/restrict substances that are in reality being used in textiles without creating additional financial costs and staff increases for the Commission, enforcement authorities and the industry.



EURATEX RECOMMENDATIONS

- It is necessary to foster a global level playing field and consistent and coherent policy frameworks in order to maximize the resilience of the industry in the EU.
- Enforcement and enforceability must be considered from the beginning and throughout all stages of the decision-making process.
- Always assess whether regulatory measures would put a disproportionate burden on EU industry and SMEs.



EURATEX
THE TEXTILES AND APPAREL CONFEDERATION

As the voice of the European textile and clothing industry, EURATEX works to achieve a favourable environment within the European Union for the design, development, manufacture and marketing of textile and clothing products.

Working together with EU institutions and other European and international stakeholders, EURATEX focuses on clear priorities: an ambitious industrial policy, sustainable supply chains, innovation and skills development, free and fair trade.

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