



Consumer products

HCT-202405-08

EU proposes to expand PAH restrictions

On May 27, 2024, the EU submitted notification [G/TBT/N/EU/1065](#) to the WTO, proposing to add Article 50a to Annex XVII of REACH, which restricts the use of polycyclic aromatic hydrocarbons in clay targets for shooting. The comment period will last for 60 days from the date of notification, and it is proposed to be adopted in the fourth quarter of 2024. The specific restriction requirements are as follows:

Clause	Restriction requirement
50a. Polycyclic aromatic hydrocarbons (PAH) (a) Acenaphthene, CAS No 83-32-9, EC No 201-469-6 (b) Acenaphthylene, CAS No 208-96-8, EC No 205-917-1 (c) Anthracene, CAS No 120-12-7, EC No 204-371-1 (d) Benzo[a]anthracene, CAS No 56-55-3, EC No 200-280-6 (e) Benzo[a]pyrene, CAS No 50-32-8, EC No 200-028-5 (Benzo[def]chrysene) (f) Benzo[b]fluoranthene, CAS No 205-99-2, EC No 205-911-9 (Benzo[e]acephenanthrylene) (g) Benzo[e]pyrene, CAS No 192-97-2 EC, No 205-892-7 (h) Benzo[ghi]perylene, CAS No 191-24-2, EC No 205-883-8 (i) Benzo[j]fluoranthene, CAS No 205-82-3, EC No 205-910-3 (j) Benzo[k]fluoranthene, CAS No 207-08-9, EC No 205-916-6 (k) Chrysene, CAS No 218-01-9, EC No 205-923-4 (l) Dibenzo[a,h]anthracene, CAS No 53-70-3, EC No 200-181-8 (m) Fluoranthene, CAS No 206-44-0, EC No 205-912-4 (n) Fluorene, CAS No 86-73-7, EC No 201-695-5 (o) Indeno[1,2,3cd]pyrene, CAS No 193-39-5, EC No 205-893-2 (p) Naphthalene, CAS No 91-20-3, EC No 202-049-5 (q) Phenanthrene, CAS No 85-01-8, EC No 201-581-5 (r) Pyrene, CAS No 129-00-0, EC No 204-927-3	Shall not be placed on the market or used, on their own or as constituents of other substances, in clay targets for shooting from [Publication Office: please fill in the date of entry falling 1 year from entry into force] if they contain more than 50 mg/kg (0.005 % by weight of dry mass of the clay target) of the sum of all listed PAHs.

HCT SOLUTION:

The PAHs listed in this draft regulation align with the 18 PAHs restricted by the German AfPS GS 2014:01 PAK. However, the current 19th edition of the German GS standard only restricts 15 PAHs. Therefore, it is recommended that relevant enterprises involved in the production of clay targets for shooting control the 18 PAHs instead of the current 15, in order to proactively meet the requirements of this regulatory draft.

