

Consumer products HCT-202511-08

## EU POPs regulation proposes to add three new persistent organic pollutants

On November 21, 2025, EU released a draft amendment to the POPs Regulation (EU) 2019/1021, proposing to add three new persistent organic pollutants: chlorpyrifos, medium-chain chlorinated paraffins (MCCPs), and long-chain perfluorocarboxylic acids ( $C_{9-21}$  PFCAs). The draft was open for public comment from November 21, 2025 to December 19, 2025, during which stakeholders could provide feedback.

The draft amendment proposes to add the following items to Part A of Annex I of Regulation (EU) 2019/1021:

2019/1021:	2019/1021:							
Substance	CAS No	EC No	Specific exemption on intermediate use or other					
			specification					
Medium-ch ain chlorinated paraffins (MCCPs)	85535-85-9 198840-65-2 1372804-76- 6 and others	287-477 -0 and others	1. For the purposes of this entry, Article 4(1), point (b), shall apply to the sum of concentrations of the linear C14 - 17 chloroalkanes of the following molecular formulae: equal to or below 1000 mg/kg (0,1 % by weight) where they are present in substances, mixtures or articles.  2. By way of derogation, the manufacturing, placing on the market and use of MCCPs shall be allowed for the following purposes:  (a) extreme pressure additive in metalworking fluids which are used in professional or industrial settings in 'heavy duty' metal working operations and for which collection systems are in place, until 31 December 2036;  (b) polymers and rubbers which are used in spare parts for, and in the repair of, any of the following:  (i) land-based motor vehicles;  (ii) machinery used in agriculture; construction, forestry or landscaping;  (iii) electric and electronic equipment for medical devices within the scope of Regulation (EU) 2017/745;  (iv) electric and electronic equipment for in-vitro diagnostic devices within the scope of Regulation (EU) 2017/746;  (v) instruments for measurement, analysis, manufacturing, control, monitoring, testing and inspection  (vi) aerospace and defence applications; where MCCPs were initially used in their production, until the end of their service life or until 31 December 2041, whichever comes earlier;  (c) flexible polyvinyl chloride in wires and cables in medical devices within the scope of Regulation (EU) 2017/746, until [OP, please insert the date: 5 years after the date of entry into force of the amendment to Annex A];  (d) adhesives, sealants and tape used for non-structural bonding for aerospace and defence applications, until [OP: please insert the date of entry into					

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			force of the amendment to Annex A];
			(e) Paints and coatings for ammunition and ammunition
			markings, until [OP: please insert the date = 5 years after
			the date of entry into force of the amendment to Annex A];
			(f) ammunition pyrotechnic defence devices to achieve specific
			effects, until 31 December 2041;
			(g) intumescent coating and paint for space and defence
			equipment and its packaging to protect against extreme
			temperature, until 31 December 2041;
			(h) coating and paint for the repair of, and use in replacement
			spare parts for, space and defence equipment where MCCPs
			were initially used in the production of that equipment, until
			the end of service life of the equipment.  3. Releases of MCCPs to the environment shall be avoided
			during manufacture and industrial and professional use of
			MCCP covered by an exemption set out in point 2 and, if not
			possible, reduced to as low a level as possible. Exposure to
			workers shall be minimised.
			4. Articles containing MCCPs already in use in the Union before
			or on the date of expiry of the relevant exemption laid down in
			paragraph 2(b) to (g) may continue to be used.
			5. Placing on the market and use of spare parts containing
			MCCPs referred to in paragraph 2, points (b) and (h) that are
			present in the territory of the Union before 1 January 2042 shall
			be allowed.
			6. Manufacturers, suppliers and importers of chlorinated
			paraffins placing on the market substances or mixtures
			containing chloroalkanes referred to in point 1 shall provide
			their downstream users and customers, in the Safety Data
			Sheet referred to in Article 31 of Regulation (EU) 1907/2006, information on:
			(i) the sum of the concentrations of the chloroalkanes listed in
			paragraph 1, if present;
			(ii) when the sum referred to in point (i) is above 0,1% w/w, the
			appropriate risk management measures and operating
			conditions to minimise the releases and exposure.
			7. Manufacturers, suppliers and importers of chlorinated
			paraffins shall determine the sum referred to in point 6(i)
			using representative batches of chlorinated paraffins
			manufactured in accordance with the same technical
			specifications by the same manufacturer. The level shall be
			determined using validated analytical methods. A description
			of the analytical methods used, and the results obtained to
			derive the sum referred to in point 6(i) shall be provided to the
1	275 05 1	206 001	competent authorities upon their request.
Long chain	375-95-1,	206-801	1. For the purposes of this entry, Article 4(1), point (b), shall
perfluoroca	335-76-2,	-3, 206-400	apply to the sum of concentrations of C <sub>9-21</sub> PFCAs and their
rboxylic acids (C <sub>9-21</sub>	2058-94-8, 307-55-1,	-3,	salts equal to or below 0,025 mg/kg (0,0000025 % by weight) where they are present in substances, mixtures or articles.
PFCAs),	72629-94-8,	218-165	2. For the purposes of this entry, Article 4(1), point (b), shall
their salts	376-06-7,	-4,	apply to the sum of concentrations of $C_{9-21}$ PFCAs related
and related	141074-63-7,	206-203	compounds equal to or below 0,26 mg/kg (0,000026 % by
			, (-,

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compounds	67905-19-5, 57475-95-3, 16517-11-6, 133921-38-7, 68310-12-3, and others	-2, 276-745 -2, 206-803 -4, 267-638 -1, 240-582 -5, 269-701 -9, and others	weight) where they are present in substances, mixtures or articles.  3. By way of derogation from paragraphs 1 and 2, for the purposes of this entry, Article 4(1), point (b), shall apply to the sum of concentrations of C <sub>9-21</sub> PFCAs, their salts and related compounds, equal to or below 10 mg/kg (0,001 % by weight) where they are present in a substance to be used as a transported isolated intermediate within the meaning of Article 3, point 15(c), of Regulation (EC) No 1907/2006 and fulfilling the strictly controlled conditions set out in Article 18(4), first subparagraph, points (a) to (f), of that Regulation for the production of fluorochemicals with a perfluoro carbon chain equal to or shorter than 6 atoms.  4. By way of derogation from paragraph 1, for the purpose of this entry, Article 4(1), point (b) shall apply to the sum of concentrations of C <sub>9-21</sub> PFCAs equal to or below 0,1 mg/kg (0,00001 % by weight) where they are present in fluoroplastics and fluoroelastomers that contain perfluoroalkoxy groups. This unintentional trace contaminant level shall not apply to articles.  All emissions of C <sub>9-21</sub> PFCAs that are unintentionally formed during the production and use of fluoroplastics and fluoroelastomers that contain perfluoroalkoxy groups shall be avoided and, if not possible, reduced as far as technically and practically possible.  5. By way of derogation from paragraph 1, for the purpose of this entry, Article 4(1), point (b), shall apply to the sum of concentrations of C <sub>9-21</sub> PFCAs and their salts equal to or below 1 mg/kg (0,0001 % by weight) where they are present in polytetrafluoroethylene micropowders that are transported or treated for the purpose to reduce the sum of concentrations of C <sub>9-21</sub> PFCAs and their salts below the limit of 0.025 mg/kg.
			This unintentional trace contaminant level shall not apply to articles. All emissions of $C_{9-21}$ PFCAs that are unintentionally formed during the production and use of fluoroplastics and
			avoided and, if not possible, reduced as far as technically and practically possible.
			this entry, Article 4(1), point (b), shall apply to the sum of concentrations of $C_{9-21}$ PFCAs and their salts equal to or below 1 mg/kg (0,0001 % by weight) where they are present in polytetrafluoroethylene micropowders that are transported or
			6. The placing on the market and use of $C_{9-21}$ PFCAs, their salts and related compounds shall be allowed until 30 December 2030 in semiconductors used in spare parts for, and the repair of, the following:
			<ul> <li>(a) electronic equipment placed on the market before 31</li> <li>December 2023 for combustion-engine powered vessels;</li> <li>(b) electronic equipment placed on the market before 31</li> <li>December 2023 for land based motor vehicles that have ceased mass production.</li> </ul>
			7. Articles containing C9- C21 PFCAs, their salts and related compounds, already in use in the Union before 31 December 2023, may continue to be used.
Chlorpyrifos	2921-88-2	220-864 -4	For the purposes of this entry, Article 4(1), point (b), shall apply to concentrations of chlorpyrifos equal to or below 0,01 mg/kg (0,000001 % by weight) where they are present in substances, mixtures or articles.

Original link: MCCPs; LC-PFCAs; Chlorpyrifos

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## **HCT SOLUTION:**

The EU's POPs regulations aim to protect human health and the environment from persistent organic pollutants (POPs). The EU's plan to add new controlled substances signifies a further strengthening of its control over these hazardous substances, reflecting the EU's stringent requirements in environmental protection and public health. HCT has long tracked and interpreted the latest international and domestic regulatory developments. With numerous top-of-the-line instruments and equipment, a professional and efficient operations team, and extensive testing experience, it can develop customized solutions for clients, helping businesses cope with challenges with ease.

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