Dear stakeholders,

Thank you for your contributions so far to supporting the study substances of concern (SoC) in packaging.

We are writing to share the draft list of identified SoC and invite feedback (using the attached Excel spreadsheet). In particular, we would be interested in your feedback on:

- The current use of the substance in question in packaging applications: we are looking for a positive confirmation (or otherwise) of the substance use in packaging materials, types and formats listed.
- Whether the substance is an intentionally added substance (IAS) or not.
- The packaging material / type / format the substance is used in.
- The technical function of the substance.

As far as possible, the above information for the identified SoC is presented in the spreadsheet. Stakeholders are kindly requested to provide input either to validate or correct existing data.

Substances of Concern (SoC)
For further context on this SoC list, a brief outline of the methodology for substance selection and SoC identification is provided below:

A list of (approx. 6000) substances has been developed based on their presence in packaging and/or packaging waste. A range of data sources were consulted including REACH registration data, regulatory lists, substance lists from relevant projects as well as industry, scientific literature, reports and NGOs (online databases and literature). The list was validated with information on use in packaging (where available in existing databases) and substance information provided by stakeholders, leading to a list of ca. 2500 substances confirmed by multiple data points and/or sources.

The vast majority of the substances identified were present in the final packaging product, including both intentionally added substances (IAS) – e.g. adhesives, coatings, inks/pigments/colourants, antioxidants, photo-initiators, and other additives, as well as non-intentionally added substances (NIAS) formed during the production, use, or recycling packaging materials. Less information was available on substances in other lifecycle stages (e.g. used in manufacture or recycling of packaging).

The substances were screened against the SoC criteria (as defined in Regulation 2024/1781 (ESPR)[1]) considering both chemical safety and negative impact on recycling. This has led to the identification of approximately 700 of those substances as SoC.

For the chemical safety aspect, the SoC identification is unambiguous based on:

- SVHC status (Article 2(27)(a))
- Harmonised classification for (relevant) chronic effects (Article 2(27)(b))
- POPs status (Article 2(27)(c))

Therefore, once the substance identity and use of the substance in packaging have been confirmed, the SoC status is confirmed as long as the substance meets one (or more) of the above criteria.

For SoC "hampering recycling" (Article 2(27)(d)), the assessment was made with reference to the JRC document[2] using the information in the CEN design for recycling standards[3] for different packaging materials as well as information provided by

[1] Regulation - EU - 2024/1781 - EN - EUR-Lex
[2] JRC Publications - Method for the identification and tracking of substances of concern in products and for the preparation of restriction measures on the use of substances in products
[3] EN 18120-1:2026 - Plastic Packaging Design for Recycling Standards

stakeholders.

As noted above, this assessment has identified approximately 700 of those substances used in packaging as SoC according to the criteria. The information you are able to provide will allow a confirmation of current substance use and validation of the SoC.

Study background
The study on substances of concern is being prepared under Article 5(2) of Packaging and Packaging Waste Regulation (PPWR) which states that *the Commission, with support from the European Chemicals Agency, shall prepare a report on the presence of substances of concern in packaging and packaging components (…)* This study report will have implications for the future management of SoC in packaging.

In accordance with the mandate received from the Commission, ECHA will submit the report to the Commission by 21 September 2026.

Regulatory follow-up
A key aim of the Packaging and Packaging Waste Regulation (PPWR) is to ensure that packaging and recycled packaging materials do not harm human health or the environment. To that end, the PPWR aims to minimise the presence and concentration of SoC in packaging or packaging components. However, the identification of SoC as part of this study *per se* does not lead to immediate regulatory obligations.

It should be noted that the study on SoC in packaging will also include a consideration of appropriate follow-up measures, such as REACH restrictions. A preliminary screening list of potential candidate substances for restriction is being developed. The presence of SoC will also be taken into consideration in the recyclability requirements under Article 6(4).

The preliminary screening list mentioned above – including potential candidate substances for restriction – should not be confused with confirmed regulatory measures that have been decided upon. Before a regulatory measure is decided, e.g., a REACH restriction, a more thorough assessment of hazard, exposure, emission and risk, including a confirmation of a level of risk requiring Union-wide action, etc. will be required. This is to be performed for specific substances (once the substance prioritisation has been confirmed) at a later stage – after the conclusion of the study.

What the list is not?
The identification of a substance as an SoC or its presence on the preliminary candidate list for REACH restrictions does not automatically lead to regulatory obligations. The SoC identification or presence on the above list do not mean that the substance will be automatically restricted or subject to further regulatory action.

Sending your feedback
We invite feedback through industry associations as well as inputs directly from individual companies. Any confidential information can be provided directly to ECHA, who will handle such data in accordance with established confidentiality protocols. If providing confidential information, please clearly indicate this in your email.

If you would like to provide feedback, please complete and return this document to the ECHA PPWR team at restriction-PPWR@echa.europa.eu by **Monday 24 August**.
Please feel free to get in touch with ECHA with any questions or clarifications.

We would like to thank you in advance for your feedback.

Kind regards,

ECHA's PPWR team