Re: Letter to REACH Cttee on restrictions: CMRs in childcare, lead in ammunition and fishing tackle and the '*Restrictions Roadblock'* report.

To: Members of the REACH Committee

Brussels, 24 April 2026

Dear Madam/Sir,

We are writing to you regarding the REACH Committee meeting that will take place on 29 April. At this meeting the European Commission will propose:

- A discussion on the draft Commission Regulation amending Annex XVII to Regulation (EC) No 1907/2006 (REACH) as regards CMRs in childcare products.
- Discussions and vote regarding the restriction on lead in ammunition and fishing tackle.

In addition, we would like to bring to your attention the report "*Restrictions Roadblock*" published today by ClientEarth and the EEB.

1. CMRs in childcare products restriction

Under agenda point 3, the Commission will present its proposal for a restriction of CMR substances in childcare products. Children are more vulnerable to harmful chemicals than adults and, due to their behaviour, are likely to be exposed in different and potentially more intense ways. Hence, children require even greater protection from the most harmful chemicals, including and especially from CMRs but also endocrine disruptors (EDCs). We are pleased to see that Commission has followed ECHA's recommendations for this restriction, namely:

· A **dynamic link to Annex VI of the CLP Regulation**, which ensures that not only currently known CMRs, but also substances which receive a harmonised classification in the future, are covered without any future adaptation needs. It ensures minimisation of the duration of the children's exposure and provides clarity and early incentives for innovation.

· An **'*as low as technically feasible'* default concentration limit for CMRs of 0.001 % w/w**. This clearly excludes any intentional use of CMRs and ensures that utmost care is taken to avoid impurities and contaminations of childcare products during processing. Furthermore, it acknowledges that many CMRs do not have a threshold below which no adverse effects can be observed.

· A **limited number of exemptions**, which aim at preventing overlapping requirements (medical products) **and ensure measures are enforceable** (second-hand items). Derogations may also be necessary in exceptional cases (inaccessible parts). However, a limitation to inaccessible parts that are necessary for electric or electronic functions would increase clarity and align with the Toy Safety Regulation. As the food contact materials regulation does not provide equal protection to a CMRs ban, in particular for non-harmonised materials, this exemption should be considered for deletion. Instead, it should be specified that the restriction may be overruled by any stricter provisions, e.g. in FCM legislations.

Our main points of criticism relate to the divergence from the investigation report, regarding the proposed transition time of 36 months of the regulation as well as the proposed transition time of 36 months of a ban entering into force after newly classified CMRs are included into the Annex VI of the CLP regulation. **ECHA recommends refraining from any transitional periods because it considers the existing timelines of the harmonised classification procedure as sufficient**. Accordingly, the Toy Safety Regulation does not foresee any transition times between harmonised classification and the prohibition of such substances in toys.

We therefore encourage you to support the proposed regulation of CMRs in childcare products, reject the inclusion of transition periods and consider modification of the exemptions.

With this restriction proposal, the Commission at least partly fulfils its commitment under the Chemicals Strategy for Sustainability to provide children with a level of protection equivalent to that defined in the Toy Safety Legislation. An important, yet missing part is the prohibition of Endocrine Disruptors in childcare products, which are of the same high relevance for children and yet lack proper regulation. While in the Toys Safety Regulation EDCs are covered under the ban of the most harmful chemicals, this cannot be implemented with an Art. 68.2 REACH restriction, because the scope of that article does not include EDCs. **Hence, we encourage the Commission and the Member States to take action to close this protection gap.**

2. Restriction of lead in ammunition and fishing tackle.

Since the original Draft Regulation on lead in ammunition and fishing tackle was published in February 2025, the proposal has changed significantly: lead bullets have been removed from the proposal and the restrictions on lead gunshot have been reduced or delayed.

Despite these concessions, **the current proposal would still bring significant benefits for public health and wildlife**, contributing to protecting 1 million children vulnerable to lead exposure from game meat, and 135 million birds at risk of poisoning through ingestion of lead gunshot.

The proposal as it stands now also addresses the key concerns from multiple stakeholders, **removing any justification to oppose the restriction**.

We urge Member States to support the proposal as it stands for the benefit of the health of people, the environment, wildlife, pets and farmed animals of the EU, to improve the sustainability of hunting, and to ensure competitive markets for safer game meat and non-toxic alternatives.

3. *Restrictions Roadblock* report

On the occasion of the 4th anniversary of the publication of the EU Restrictions Roadmap, ClientEarth and the EEB have published the *Restrictions Roadblock* report that analyses the progress of this plan to swiftly restrict well known highly hazardous chemicals. The Restrictions Roadmap was supported by all EU institutions and intended to advance pending protection while the needed improvements of the REACH legal text were to be adopted through the REACH revision.

The results of our analysis show:

1) **Lack of action and delays** in the processing and adoption of restrictions, once in the pipeline, and/or

2) a **significant lack of ambition** in the restrictions proposed, and/or

3) a **repeated lack of transparency and justification** for the decisions (not) taken.

The results are dismal and clearly identify the European Commission as the chief roadblock to its own Roadmap. After making rapid early progress, the Commission has today effectively frozen 14 of the 22 files, nearly two thirds of its 2022 agenda. Of these 14, it has yet to begin regulating 7 and is largely responsible for holding up the finalisation of 7 others. Just 6 restrictions have been adopted into law since the adoption of the Roadmap. The 3-month 'legal deadline' from the publication of ECHA's opinions to the publication of a draft decision by the Commission is described as a myth, never having been met. Delays range from 13 to 47 months, with two years being the average. In addition to the core analysis, the authors show examples of how the Commission is also watering down the scope or implementation of the Roadmap restrictions. The report concludes with a set of recommendations to accelerate the implementations of the Roadmap including:

- **Presenting restriction proposals swiftly** for all chemicals included in the Roadmap.
- **Respecting the obligation to mitigate an identified unacceptable risk** by introducing a new or amending an existing restriction (REACH Article 68(1)).
- **Ensuring ECHA and Member States have sufficient resources and support** to implement the Roadmap.
- **Ensuring compliance** with legal timelines set by the REACH regulation for the different stages of the restriction process.
- **Increasing transparency** on implementation of the Roadmap, **with justifications** for any delays/changes in framing the restrictions.

- **Improving the restriction process** to reduce uncertainties and speed up the decision-making process.
- **Take enforcement seriously** but do not allow enforceability concerns to lower the level of ambition.
- **Ensuring that adequate information on hazards and uses is available** for regulatory processes

We call on the Commission to comply with its legally binding obligations to ensure a high level of protection of both the environment and human health by accelerating the restriction of the most harmful chemicals and accelerate the implementation of the Restrictions Roadmap.

Yours faithfully,

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