UK/EU differences in environmental/health protections from harmful substances since 1/1/2021

	UK HEALTH & SAFETY EXECUTIVE (HSE)	**EUROPEAN CHEMICALS AGENCY** (ECHA)
Restrictions: Those adopted since the UK exited the EU. (Those initiated since the UK exited, i.e. those on the EU's registry of intention (RoI), which are subject to clear timeframes by which the regulator must submit its risk assessments and proposals for risk management).	**2** (3)	**14**[i] (24)
Restrictions: substances that pose risks to health and/or the environment can be "restricted", including through a total ban on a substance, bans on certain uses or concentrations, or requirements for technical measures or specific labelling.	In July 2025, the government announced the first restriction in UK REACH – on lead ammunition, that it aims to enact in legislation by summer 2026. This was initiated in 2021, alongside one on harmful substances in tattoo ink. In January 2026, the Minister took a decision on this restriction and strengthened it, bringing it closer to the EU's level of protection. This now needs to be enacted via legislation. In March 2024, a restriction on PFAS in fire-fighting foams (FFF) was initiated, and a restriction proposal published in August that is broadly similar to the EU's. In its new criteria for prioritising substances, published in summer 2025, no UK REACH restriction workstreams are planned for the financial year 2025-2026 other than PFAS in FFF. The strategic approach set out in this document is to 'draw more from regulatory decision-making in other jurisdictions'.	13 restrictions on the use of hazardous chemicals have been adopted by the EU since the UK exited EU REACH, including on intentionally-added microplastics and formaldehyde. Another 11 more have been initiated. In addition, the EU Restrictions Roadmap (RR) which targets groups of widely used chemicals of key concern such as PFAS, bisphenols and certain brominated flame retardants, would, if fully implemented, lead to an estimated 5-7,000 chemicals being banned by 2030. The UK/EU gap is on course to become a chasm with the implementation of the Roadmap, without intervention. The RR is separate from the proposed revision of the EU REACH regulation, which has been delayed. Some of these restrictions are now in the pipeline and under investigation by ECHA – e.g. carcinogenic, mutagenic and reprotoxic (CMR) substances in childcare articles.
Substances added to SVHC Candidate List	**15**	**44**

Substances that may have very serious effects on human health and the environment can be identified as Substances of Very High Concern (SVHCs). These are primarily substances which are carcinogenic, mutagenic, reprotoxic, as well as persistent and bioaccumulative. Entry on the SVHC Candidate List carries immediate obligations on companies to provide sufficient information to their customers and consumers to allow safe use and puts substances in line for further regulatory attention.	In 2021, HSE said it was considering just 4 out of the 10 substances that were added to the EU list that year for the UK's SVHC List. In July 2025, the government said it would review 'interim principles' introduced in 2021 for adding new substances to the SVHC list. Depending on the outcome of that review, it will "consider our approach to additions made to the EU REACH candidate list since 1 January 2021". In March 2026, the government consulted on adding 15 substances to the list. These were added in June 2026.	**Ten** substances were added to the EU Candidate List in 2021 (in January and July). Another **5** substances were added in 2022 (four in January and one in June). Another **11** substances were added in 2023 (9 in January, including the high-volume flame retardant, TBBPA, and 2 in June). Another **7** were added in 2024 (in January, June and November). Another **5** were added in Jan 2025 Another **3** were added in June 2025 Another **1** was added in October 2025 Another 2 were added in Feb 2026
Substances added to Authorisation List	**0**	**5**
SVHCs that are added to the 'authorisation list' (Annex 14) cannot be placed on the market unless a company has been given "authorisation" for a specific use; to get this, a company must demonstrate that either the risks arising from the use(s) applied for are adequately controlled or that there are no alternatives available and the socio-economic benefits outweigh the risks arising from the uses.	In 2021, HSE recommended 2 substances for the UK authorisation list, dicyclohexyl phthalate and disodium octaborate. In January 2024, HSE recommended adding Diisohexyl phthalate (DIHxP) to Annex 14. In November 2025, HSE put forwards a draft recommendation for 3 substances to be included in the authorisation list. The full list of recommended substances are here. The addition of these three substances were consulted on November 2025-February 2026.	ECHA recommended 25 substances for the authorisation list (in 2019 in its 9th recommendation and in April 2021 in its 10th recommendation), of which five were added to the EU authorisation list in April 2022, including Tetraethyllead in aviation fuel. In April 2023, ECHA recommended 8 substances for the authorisation list. In February 2024, it invited comments on a further 5 substances it is considering recommending for the list. In November 2025, ECHA recommended four substances for the Authorisation List, including melamine. In May 2026, ECHA issued its 13th recommendation, recommending a further 4 substances to be added.

EU restrictions adopted since 1/4/21

1. Concentration limit for 8 PAHs (polycyclic aromatic hydrocarbons) used on artificial football pitches and playgrounds (adopted 20/07/21)
2. Tattoo ink (adopted 14/12/20)
3. Lead gunshot in wetland (adopted 25/01/21)
4. N- N-dimethylformamide (adopted 19/11/2021)
5. C9-C14 PFCAs, long-chain PFAS (adopted 14/08/21)
6. Lead in PVC (adopted 3/523)
7. Intentionally added microplastics (adopted 25/09/23)
8. Formaldehyde (adopted 14/07/23)
9. PFHxA restriction (adopted 19/9/24)
10. Siloxanes D4, D5 and D6 (adopted 16/05/24, started applying 6/06/24)
11. PAHs in clay targets (adopted 1/4/25, will start applying 22/4/26)
12. PFAS used in firefighting foams (adopted by the Commission 29/4/25)
13. N,N-dimethylacetamide (DMAC) and 1-ethylpyrrolidin-2-one (NEP) (adopted 2/06/25, will start applying 22/6/25

14. 2,4-dinitrotoluene in articles (adopted 20/04/26, will start applying May 2027)