



EUROPEAN COMMISSION

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs  
Ecosystems I: Chemicals, food, retail

Directorate-General for Environment  
Circular Economy

Directors

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**NOTE FOR THE ATTENTION OF  
Ms SHARON MCGUINNESS, EXECUTIVE DIRECTOR ECHA**

**Subject: Request to the European Chemicals Agency (ECHA) to reassess the concentration limits for eight Polycyclic Aromatic Hydrocarbons (PAHs) in loose rubber granules and mulches used in children's playgrounds, as well as other domestic applications, and propose restrictions if necessary.**

Entry 50 of Annex XVII to REACH was amended on 21 July 2021 by Commission Regulation (EU) 2021/1199 setting a concentration limit of 20 mg/kg of the sum of eight Polycyclic Aromatic Hydrocarbons (PAHs) in granules for use as infill material in synthetic turf pitches and in granules and mulches in loose form on playgrounds or in sport applications. Some Member States have queried whether the concentration limit value recommended by the Committee for Risk Assessment (RAC) and proposed by the Commission was sufficiently protective for the most vulnerable groups of the population, such as very young children using playgrounds. This in light of the existing concentration limits of 1 mg/kg for each individual of the eight listed PAHs in certain articles (e.g. shock absorbing tiles on playgrounds) in REACH Annex XVII, entry 50 paragraph 5, and 0.5 mg/kg for each individual of the eight listed PAHs in toys and childcare articles in entry 50 paragraph 6.

Therefore, the Commission is requesting ECHA to specifically assess the risks to children posed by PAHs in granules and mulches in loose form in playgrounds, as well as other domestic applications such as gardening and landscaping, in order to determine if the respective applicable concentration limit for the (sum of eight) PAHs is consistent with a high level of protection of human health<sup>1</sup>.

If the risks associated with the concentration limit are concluded not to be adequately controlled, ECHA shall prepare a dossier conforming with the requirements of Annex XV proposing restrictions to address the identified risk.

<sup>1</sup> For use in playground the concentration limit of 20 mg/kg of the sum of eight PAHs applies, for domestic application the generic concentration limit set by entry 28 of REACH Annex XVII applies.

## *Timing*

ECHA shall proceed with the request in a stepwise manner and should aim to conclude an initial screening assessment of risks (i.e. based on reasonable worst case assumptions and available data) by the end of February 2023.

Where the results of the initial assessment indicate that risks from PAHs in granules in loose form on children's playgrounds and other domestic applications such as gardening and landscaping are not adequately controlled, ECHA shall proceed with the development of a report conforming to the requirements of Annex XV of REACH comprising a refined risk assessment and, conditional on the results of the refined risk assessment, a proposal for restrictions to address the identified risk.

Where appropriate, ECHA shall notify the relevant intention to develop an Annex XV report to the Register of Intentions no later than March 2023 and should aim to have completed the development of the Annex XV report by January 2024. Where the Annex XV report proposes restrictions to address an identified risk this shall be submitted to ECHA's Committees for Risk Assessment (RAC) and Socio-economic Analysis (SEAC) for opinion-making.

Yours sincerely,

*(e-signed)*

Kristin Schreiber  
DG Internal Market, Industry,  
Entrepreneurship and SMEs

*(e-signed)*

Aurel Ciobanu-Dordea  
DG Environment