

## BACKGROUND NOTE

# CALL FOR EVIDENCE ON CERTAIN NON-POLYMERIC AROMATIC BROMINATED FLAME RETARDANTS (ABFRs)

### Introduction and scope

Aromatic brominated flame retardants (ABFRs) are a broad category of flame retardants in which bromine atoms are covalently bound to an aromatic ring. ABFRs are added to polymeric materials to prevent or slow the growth of fire by interfering with the radical chain mechanism occurring in the gas phase of a combustion.

On 18 December 2024, ECHA published an investigation report on ABFRs<sup>1</sup>, concluding that many non-polymeric additive ABFRs are of concern due their PBT (Persistent, Bioaccumulative, Toxic) or vPvB (very Persistent, very Bioaccumulative) properties and because they are released to the environment in relevant quantities.

The report identified the main sectors contributing to environmental releases as electrical and electronic equipment (EEE), building and construction, and textiles. Furthermore, releases from the waste stage were identified as key contributors to the overall emissions.

Against this background, on 11 November 2025, the European Commission [requested](#) ECHA to prepare an Annex XV restriction dossier on certain non-polymeric ABFRs.

### Scope of the mandate

The restriction dossier will cover three substances that are identified as SVHC based on their vPvB hazards, as well as substances containing these SVHCs at concentrations of 0.1% (w/w) or higher (Table 1).

Please note that because the mandate may be expanded, this call for evidence covers additional non-polymeric ABFRs listed in Table 2.

The Commission mandate covers the following product categories:

1. Electrical and Electronic Equipment (EEE) as defined in Directive 2011/65/EU<sup>2</sup>,
2. Construction products, as defined in Regulation (EU) No 305/2011<sup>3</sup>, and
3. Textile products, as defined in Article 3(1)(a) of Regulation (EU) 1007/2011<sup>4</sup> and in products referred to in article 2(2) of that regulation.

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<sup>1</sup> [ABFR investigation report](#). See also [Regulatory strategy for flame retardants](#)

<sup>2</sup> [EUR-Lex - 02011L0065-20250101 - EN - EUR-Lex](#) EEE exempted from the scope of Directive 2011/65/EU - and reported in article 2(4) - are also not in scope of the restriction mandate.

<sup>3</sup> [EUR-Lex - 02011R0305-20241117 - EN - EUR-Lex](#) Regulation (EU) No 305/2011 was repealed by Regulation (EU) 2024/3110 available at [Regulation - EU - 2024/3110 - EN - EUR-Lex](#)

<sup>4</sup> [EUR-Lex - 02011R1007-20180215 - EN - EUR-Lex](#)

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### Substances in scope may change

The mandate requests ECHA to assess:

- the PBT/vPvB properties of ABRs beyond those listed in the mandate, and
- the feasibility of restricting other non-polymeric ABRs that may later receive harmonised classification as PBT or vPvB under the CLP Regulation ("dynamic link" clause).

The Commission will use these two interim deliverables to decide whether to amend the restriction mandate.

At this stage, ECHA identified 19 ABRs for PBT/vPvB assessment (Table 2). These substances are also subject to this call for evidence.

**Table 1:** SVHC substances listed in the current mandate (**bold**) and substances identified as containing them at or above 0.1 % (w/w) (*cursive*)

EC No.	CAS No.	Common acronym or substance name	Common acronym
284-366-9	84852-53-9	1,1'-(ethane-1,2-diyl)bis[pentabromobenzene]	DBDPE
700-158-7	1092834-40-6	<i>Brominated 1,1'-ethane-1,2-diylbisbenzene</i>	<i>DBDPE and lower brominated analogues<sup>5</sup></i>
247-426-5	26040-51-7	Bis(2-ethylhexyl) tetrabromophthalate	TBPH
428-050-2		<i>reaction mass of: 2-ethylhexyl 2,3,4,5-tetrabromobenzoate bis(2-ethylhexyl) 3,4,5,6-tetrabromophthalate</i>	<i>Reaction mass of TBPH and EHTBB</i>
253-692-3	37853-59-1	1,1'-[ethane-1,2-diylbis(oxy)]bis[2,4,6-tribromobenzene]	BTBPE

**Table 2:** ABRs that will be covered in the interim report on PBT/vPvB assessment and that are also subject to this call for evidence

EC No.	CAS No.	Common acronym or substance name	Common acronym
701-414-0	56720-20-8	dioctyl tetrabromophthalate	
701-415-6	109230-28-6	dihexyl tetrabromophthalate	
201-236-9	79-94-7	2,2',6,6'-tetrabromo-4,4'-isopropylidenediphenol	TBBPA
244-617-5	21850-44-2	2,2',6,6'-tetrabromo-4,4'-isopropylidenediphenol	TBBPA-BDDP
253-693-9	37853-61-5	4,4'-(isopropylidene)bis[2,6-dibromoanisole]	TBBPA-BME
306-832-3	97416-84-7	1,1'-(isopropylidene)bis[3,5-dibromo-4-(2,3-dibromo-2-methylpropoxy)benzene]	TBBPA-BDBPE
400-440-7		[Not publicly available]	INTERSTAB FR 184

<sup>5</sup> This substance contains DBDPE.

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944-461-4		Reaction mass of 1,1'-(isopropylidene)bis[3,5-dibromo-4-(2,3-dibromo-2-methylpropoxy)benzene] and 1,3-dibromo-2-(2,3-dibromo-2-methylpropoxy)-5-{2-[3,5-dibromo-4-(2,3,3-tribromo-2-methylpropoxy)phenyl]propan-2-yl}benzene	Reaction mass of TBBPA-DBDPE and another similar
603-094-7	125904-11-2	Benzene, ethenyl-, ar-bromo derivs.	
201-773-9	87-82-1	Hexabromobenzene	HBB
201-593-0	85-22-3	2,3,4,5,6-pentabromoethylbenzene	PBEB
201-774-4	87-83-2	2,3,4,5,6-pentabromotoluene	PBT
245-688-5	23488-38-2	2,3,5,6-tetrabromo-p-xylene	TBX
621-703-4	608-90-2	1,2,3,4,5-pentabromobenzene	PBBz
251-118-6	32588-76-4	N,N'-ethylenebis(3,4,5,6-tetrabromophthalimide)	EBTBP
402-550-0		Perbromo-N,N'-biphtalimide	ADINE BBH 44
814-310-6	183658-27-7	Benzoic acid, 2,3,4,5-tetrabromo-, 2-ethylhexyl ester	EHTBB
261-526-6	58965-66-5	Tetradecabromo-1,4-diphenoxybenzene	TBDBP
605-018-8	155613-93-7	1H-Indene, 2,3-dihydro-1,1,3-trimethyl-3-phenyl-, octabromo deriv.	OBIND / OBTMPI

### Restriction Options under assessment

This call for evidence seeks information on the socio-economic impacts of three potential restriction options:

1. Restriction option 1: Restriction of 5 substances listed in Table 1
2. Restriction option 2: Restriction of a broader group of 24 substances (Table 1 + Table 2).
3. Restriction option 3: Restriction of the substances in Table 1 and any substance in Table 2 if classified in the future as PBT or vPvB according to the CLP Regulation ("dynamic link" clause).

Note that the final restriction proposal may be based on one or several group definitions and not on a closed list.

The information submitted in this call for evidence will be used to assess, the socio-economic impacts of the considered restriction option(s), the feasibility of alternatives, as well as the risk(s).

### Timeline

The call for evidence will start on 21 January 2026 and ends on 18 March 2026 (23:59 – Helsinki time).

## Specific information requests

This call for evidence includes several specific questions to gather information primarily on the following topics:

1. Stakeholders' reactions to the restriction options being considered by ECHA
2. Compliance costs of the restriction options and other economic impacts
3. Information on alternatives
4. Other impacts (e.g. social impacts, on trade, etc.).

Information on other topics, including hazard and risk information can also be submitted in response to this call for evidence.

Any statement, figure or information provided via this call for evidence should be supported with a robust justification, including references and calculations where relevant. Unsupported information may not be considered.

## Who should participate?

This call for evidence is intended for

- Private companies (e.g. polymer compounders for the electrical and electronic sector (EEE), formulators of mixtures for the coating of textiles, manufacturers of construction products, suppliers of flame retardants, importers of articles containing the non-polymeric ABFRs, etc.)
- Sector associations
- Laboratories and scientific organisations
- NGOs and other stakeholders
- Member State Authorities holding relevant information for this restriction.

Both EU/EEA and non-EEA/EU stakeholders are encouraged to participate.

For any clarifications please contact: [flame-retardants@echa.europa.eu](mailto:flame-retardants@echa.europa.eu).

## How to submit comments

Please complete the EU survey available at [EUSurvey - Survey](#).

When responding to this survey, make sure you only include **non-confidential information**. You will have the possibility to complement your submission with confidential information and attachments using a separate webform. The link for the webform is available at the end of the survey. As you complete the survey, you will have the possibility to save the draft responses.