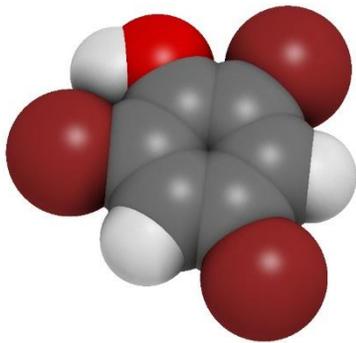


Aromatic brominated flame retardants: What ECHA's restriction work could mean for the tape value chain



ECHA is collecting evidence to support preparation of a potential REACH restriction on non-polymeric, additive aromatic brominated flame retardants (ABFRs). The mandate focuses on electrical and electronic equipment (EEE), construction products and textile products. For tape businesses, the key issue is that these sectors are major end markets for adhesive tapes and that compliance expectations typically cascade quickly to components and materials.

[Watch recent ECHA webinar "Call for evidence on restriction preparation for aromatic brominated flame retardants"](#)

Why this matters to the European adhesive tapes industry

- 1. Tapes sit inside all three product categories in scope**
Tapes are routinely used as functional components or assembly aids in electronics and cabling, construction systems and technical textiles. If ABFR content becomes restricted in these product categories, requirements will be pushed down to components, including tapes.
- 2. A low threshold is being assessed, at homogeneous-material level**
ECHA is considering a ban on placing in-scope products on the market when relevant ABFRs are present at **≥0.1% by weight (in homogeneous material)**. For multilayer tape constructions, this typically translates into layer-level scrutiny (backing, adhesive, liner, coatings), which is how customer questionnaires and audits are usually framed.
- 3. Recycling and recycled content are a pressure point**
The restriction work is explicitly life-cycle driven, including attention to the waste and recycling stage. This matters for tape constructions relying on recycled polymer backings or foams, and for customers seeking higher recycled content while avoiding legacy contaminants that could affect marketability.

What ECHA is doing now

ECHA is using a call for evidence to collect robust, decision-useful information on:

- Where ABFRs occur in products and supply chains
- Whether and how substitution could happen (full, partial, or not feasible)
- Time and cost implications (reformulation, requalification, redesign)
- Socio-economic impacts across the value chain.

A consistent theme is that many value chains recognise trade names rather than chemical identities. Companies should expect increasing pressure to provide substance-based confirmation (where possible) and to explain any constraints on disclosure.

Substances and restriction options being assessed

ECHA is assessing three restriction options:

- **Restriction option 1 (Group A)**
A narrower scenario covering five substances, including the three SVHC substances referenced in the mandate (DBDPE, TBPH, BTBPE) plus two additional substances identified as containing those at or above a relevant threshold.
- **Restriction option 2 (Group A + Group B)**
A broader scenario covering 24 substances (Group A plus 19 additional non-polymeric, additive ABRs).
- **Restriction option 3 (dynamic link concept)**
A scenario where a narrower starting set is restricted and additional ABRs could be pulled into scope over time via a “dynamic link” mechanism tied to future harmonised PBT/vPvB classifications under CLP.

ECHA also indicated it does not plan to apply an “essential use” concept in this restriction proposal.

What is in scope

The mandate covers:

- **EEE**, aligned to the RoHS scope (with RoHS-type exclusions)
- **Construction products**, as defined under the Construction Products framework
- **Textile products**, as defined under the Textile Labelling Regulation (including textiles used in automotive applications; defence textiles are excluded by the mandate).

The restriction conditions are expected to apply to imports as well, as the trigger is “placing on the market” (first making available on the E.U. market). In practice, although the legal conditions attach to the three product categories, ECHA expects the restriction to affect intermediate and semi-finished supply chains (for example polymer compounds and sector-specific formulations).

What this means for tape businesses

Even before any final legal text, the restriction process itself typically drives near-term market shifts:

Faster, more granular customer requests

OEMs and specifiers will ask for ABR declarations in components, often requiring layer-level statements aligned to homogeneous-material logic.

Acceleration of substitution pressure

Many customers move early on “restricted substance” files, particularly in electronics, construction assemblies and technical textiles.

Increased scrutiny of recycled inputs

If the 0.1% homogeneous-material approach is carried through, the presence of legacy ABRs in

recyclates can become a market-access issue. Expect questions on traceability, screening, evidence and change control.

Timeline

- **18 March 2026:** Public consultation closes
- **December 2026:** Report on alternatives to ABFRs in scope of restriction mandate; covering hazard, release/exposure and risk assessment, and technical and economic feasibility of restriction
- **September 2027:** Report on organophosphorous flame retardants (OPFRs) ; covering hazard and risk properties, emissions, impact on waste management and recycling
- **January 2030:** Assumed entry into force of restriction, with a transition period of 18 months.

How this fits into Afera's ongoing regulatory work

This file is already on the radar of Afera's Regulatory Affairs Working Group (RAWG) monitoring. ABFRs have been tracked as part of the broader REACH restrictions landscape and related Commission mandate activity, including the stakeholder webinar. Afera will continue monitoring this restriction work and keep Members informed as it progresses.

What tape companies should do now

1. **Map potential relevance across your tape constructions**
Check whether ABFR-containing materials could enter via backings, films, foams, laminates, coatings or purchased components used in EEE, construction or textile applications.
2. **Start supplier engagement early**
Ask targeted questions now, so you are not chasing declarations under unrealistic timelines later. Where possible, request substance-identifier-based confirmation rather than trade-name-only statements.
3. **Build a customer-ready evidence pack**
Prepare consistent layer-level declarations and a clear narrative on substitution feasibility, qualification lead times and constraints (including any recycled-content implications). This is often what determines whether customers accept an interim position while alternatives are validated.
4. **Respond to ECHA's call for evidence by 18 March 2026**
Provide information to ECHA on identity, concentration, tonnage and product type where ABFRs are used. Additionally, it is possible to provide feedback on the restriction options as described above.

Further information

- [ECHA webinar](#)
- [ECHA webinar slides doc.](#)
- [ECHA webinar Q&A doc.](#)
- [ECHA call for evidence](#)
- [Afera's recent article "ECHA webinar on aromatic brominated flame retardants: Why it matters for the tape value chain"](#)