

Member Associations  
Members of IFRA Committees  
Cc: RIFM  
Members of the JAG  
Downstream User Associations

September 10<sup>th</sup>, 2020

## Information Letter 1098

### Subject: BMHCA – restriction in household products in the EU

Dear Colleagues,

Through IL1095 we informed you over the ban of BMHCA in cosmetic products in the EU due to the Rep. 1B harmonized classification. We also informed you that the ban was not affecting household products (e.g. detergents, household and cleaning products, air-fresheners).

#### Restriction details

Through this IL we would like to inform you that, indeed, the ban of BMHCA does not apply to household products but the REACH Regulation imposes a restriction<sup>1</sup> to the placing on the market and use of Rep 1B substances in the EU.

The restriction, in practice, implies the following:

- **BMHCA cannot be placed on the market or used**, in products sold to the general public (consumers) **when its concentration is equal or above** the generic concentration limit specified in part 3 of Annex I of the EU CLP - i.e. **0.3%** (final product (mixture) is not classified as Rep 1B).
- **BMHCA may be placed on the market and used in products sold for professional use** above the classification concentration limit of **equal or above 0.3%** (product is classified as Rep 1B). In this case the packaging of such substances and mixtures has to be **marked** visibly, legibly and indelibly as **'Restricted to professional users'**.

This restriction applies to BMHCA as such, as constituent of other substances, or, in mixtures.

#### Restriction timing

It has to be noted that, in order for the restriction to be applied, BMHCA must be added to the Appendix 6 to the REACH Annex XVII, i.e., the REACH regulation will have to be amended accordingly; **it does not happen automatically due to the EU CLP harmonized classification.**

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<sup>1</sup> See page 224 of REACH Annex XVII on Restrictions: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006R1907-20200428&from=en>



For recent ATPs the European Commission has succeeded in making the corresponding REACH amendment with the **same applicability date as the EU CLP harmonized classification, i.e. 1 March 2022**. This would mean that, as from this date onwards, consumer products containing 0.3% or more of BMHCA can no longer be sold in the EU.

If you have any further questions, please write to Cristina Arregui ([carregui@ifraorg.org](mailto:carregui@ifraorg.org)) at IFRA.

Best regards,

IFRA