



## EU Regulates 2,4-Dinitrotoluene in Entry 83 under REACH

### Regulatory Alert: New REACH Restrictions for 2,4-DNT (Entry 83)

Important Update: EU Bans 2,4-DNT in Articles – What You Need to Know

The EU regulatory landscape is shifting. To ensure our business remains compliant and ready for potential customer inquiries, we are highlighting a critical update to the REACH Regulation regarding **2,4-Dinitrotoluene (2,4-DNT)**.

#### The Background: From Monitoring to a Mandated Ban

Previously, 2,4-DNT was managed as a Substance of Very High Concern (SVHC) on the Candidate List. Under that status, the primary obligation for businesses was transparency—notifying authorities and informing customers if the substance exceeded 0.1%.

**The Change:** The European Commission has now moved 2,4-DNT to **REACH Annex XVII (Entry 83)**. This shifts the requirement from "disclosure" to a **strict prohibition**.

#### Key Provisions of Entry 83

- **The Limit:** Articles containing 2,4-DNT in concentrations **equal to or greater than 0.1% by weight** are prohibited from being placed on the EU market.
- **Closing the Loophole:** This restriction applies specifically to **imported articles**. While EU manufacturers were already restricted via the Authorization List, this update ensures that non-EU manufacturers must meet the same rigorous standards to sell within the Union.

#### Critical Deadlines

- **May 10, 2027:** General compliance deadline for most consumer goods (electronics, plastics, apparel, etc.).
- **May 11, 2029:** Extended deadline for specific automotive applications, such as seat belt pre-tensioners.
- **Stock Clause:** Any articles already placed on the EU market before May 10, 2027, may continue to be sold until stocks are exhausted.

**Impact Assessment by Product Group**

The impact of Entry 83 varies significantly depending on the product category and existing sector-specific laws:

| Product Category   | Impact Status | Regulatory Context                                                                                                                        |
|--------------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| Furniture          | High Impact   | This is the primary category affected. Furniture (including foams and dyes) is <b>not exempted</b> . It must stay below 0.1% by May 2027. |
| Toys               | Exempted      | Already strictly regulated under Toy Safety Directive CMR rules. Entry 83 does not apply if they meet toy-specific safety laws.           |
| Food Contact (FCM) | Exempted      | Regulated under Framework Regulation (EC) No 1935/2004; safety is managed by EFSA.                                                        |
| Automotive         | Deferred      | Specific components have until 2029 to phase out the substance.                                                                           |

**Internal Action Items**

Customers—particularly in the **furniture and electronics sectors**—may begin requesting 2,4-DNT testing to verify compliance ahead of the 2027 deadline.