



EU REACH Annex XVII proposes to add control requirements for 2,4-dinitrotoluene

On September 15, 2025, the World Trade Organization (WTO) published Notification G/TBT/N/EU/1154, which outlines the European Commission's proposal to amend Annex XVII to Regulation (EC) No. 1907/2006 to include new restrictions on 2,4-dinitrotoluene. The draft notification will be subject to a 60-day public consultation, with a proposed adoption date of the fourth quarter of 2025 and entry into force 20 days after publication in the Official Journal of the European Union.

The restrictions on 2,4-dinitrotoluene in the draft notification are as follows:

Substance	Proposed restrictions
2,4-dinitrotoluene CAS No:121-14-2 EC No:204-450-0	<ol style="list-style-type: none">1. After [OP, please insert the date: 12 months minus 1 day after the entry into force of this Regulation], shall not be placed on the market, or used, as a substance in articles for professional users or the general public, in a concentration equal to or greater than 0,1 % by weight.2. For the purpose of this entry, "professional user" shall mean any worker or self-employed worker operating outside of industrial sites.3. Paragraph 1 shall not apply to:<ol style="list-style-type: none">(a) explosives, as defined in Article 2, point (1), of Directive 2014/28/EU;(b) articles for military use;(c) ammunition for use, in accordance with national law, by the police or other security forces;(d) toys within the scope of Regulation (EU) No XX/XXXX of the European Parliament and Council on the safety of toys and repealing Directive 2009/48/EC;*(e) devices within the scope of Regulation (EU) 2017/745;(f) articles intended to come into contact with food, within the scope of Regulation (EC) No 1935/2004.4. For the purposes of paragraph 3, point (a), the following shall not be deemed to be explosives:<ol style="list-style-type: none">(a) pyrotechnic articles, as defined in Article 3, point (1), of Directive 2013/29/EU;(b) ammunition.5. By way of derogation from paragraph 1, that paragraph shall apply from [OP please insert the date: 36 months after the entry into force of this Regulation] to the placing on the market and use of 2,4-dinitrotoluene in the





	<p>following applications, where they are placed on the market for use, or used in motor vehicles as defined in Article 3, point (16), of Regulation (EU) 2018/858 of the EN 2 EN European Parliament and of the Council :</p> <p>(a) micro gas generators for seat belt pre-tensioners and bonnet actuators;</p> <p>(b) spare parts.</p> <p>6. By way of derogation, paragraph 1 shall not apply to motor vehicles referred to in paragraph 5, that:</p> <p>(a) were placed on the market between [Publication Office, please insert the date of 12 months after the entry into force of this Regulation] and [OP please insert the date: 36 months after the entry into force of this Regulation]; and</p> <p>(b) contain 2,4-dinitrotoluene only in applications pursuant to paragraph 5, points (a) or (b).</p> <p>7. Paragraph 1 shall not apply to 2,4-dinitrotoluene in articles placed on the market in the Union before [Publication Office, please insert the date of 12 months after entry into force of this Regulation].</p>
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2,4-dinitrotoluene, CAS No 121-14-2, EC No 204-450-0, is classified in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council as a carcinogen, category 1B. In addition, 2,4-dinitrotoluene was identified as substance of very high concern meeting the conditions of Article 57, point (a), of Regulation (EC) No 1907/2006 and added to Annex XIV to that Regulation. For that substance, it is not possible to set a Derived No-Effect Level ('DNEL') and therefore it is a non-threshold carcinogen. Entry 28 of Annex XVII to Regulation (EC) No 1907/2006 restricts the placing on the market and use of 2,4-dinitrotoluene for supply to the general public, as a substance, as a constituent of other substance or in a mixture when the concentration of 2,4-dinitrotoluene equal to or greater than 0,1 % by weight.

EU considered that the exposure potential of 2,4-dinitrotoluene as plasticiser in plastic articles and as additive in any plastic material can be considered high. Based on its physical-chemical properties, 2,4-dinitrotoluene is assumed to diffuse easily in the plastic matrix and partition from surface to contact medium (water, saliva or skin). Consequently, exposure to 2,4-dinitrotoluene from using plastic sample bottles cannot be excluded.

Original link: [G/TBT/N/EU/1154](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32018L0858)

HCT SOLUTION:

HCT reminds customers to continue to pay attention the latest developments in domestic and international environmental regulations, actively evaluate and adjust the relevant substances in their products, and ensure that products comply with the laws and regulations of the destination country and international standards during design, production, and export. HCT has a wide range of testing areas and convenient service channels to help companies evaluate restricted chemical substances in their products and ensure that your products meet the corresponding national or international requirements.

