ECHA
EUROPEAN CHEMICALS AGENCY

Annual Report 2025

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Annual Report 2025

Reference: ECHA-26-R-03-EN
ISBN: 978-92-9468-528-5
ISSN: 2600-0849
Cat. Number: ED-01-26-005-EN-N
DOI: 10.2823/1842632
Publ.date: April 2026

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European Chemicals Agency

P.O. Box 400, FI-00121 Helsinki, Finland

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List of acronyms

Acronym	Description
AD	Administrator
AfA	Applications for authorisation
AI	Artificial Intelligence
APCRA	Accelerating the Pace of Chemical Risk Assessment
ARN	Assessment of regulatory needs
ASO	Accredited Stakeholder Organisation
AST	Assistant
BAT	Best Available Technique
BEF	BPR-EN-FORCE (Forum-coordinated BPR enforcement project)
BoA	Board of Appeal
BPC	Biocidal Products Committee
BPR	Biocidal Products Regulation
BPRS	BPR Subgroup of the Forum
BREF	Best Available Techniques Reference Documents
C&L	Classification and labelling
CA	Contract agent
Chesar	Chemical Safety Assessment and Reporting tool
CLEN	Customs Laboratories European Network
CLH	Harmonised classification and labelling
CLP	Classification, labelling and packaging (and the respective Regulation)
CoIAC	Conflict of Interest Advisory Committee
COM	European Commission
CoRAP	Community rolling action plan
CRCF	Carbon Removal Certification Framework
CRM	Customer relationship management
CSS	Chemicals Strategy for Sustainability of the Commission
DG DIGIT	Directorate General for Informatics
DG EMPL	Directorate General for Employment, Social Affairs and Inclusion

Acronym	Description
DG GROW	Directorate General for Internal Market, Industry, Entrepreneurship and SMEs
DG NEAR	Directorate General for Neighbourhood and Enlargement Negotiations
DG RTD	Directorate General for Research and Innovation
DG TAXUD	Directorate-General for Taxation and Customs Union
DNA	Designated national authorities
DoI	Declaration of Interests
DWD	Drinking Water Directive
EAP	Environmental Action Programme
EC	European Commission
ECA	European Court of Auditors
ECDC	European Centre for Disease Control
ECHA	European Chemicals Agency
eChemPortal	OECD Global Portal to Information on Chemical Substances
ED	Endocrine disruptor
EDPS	European Data Protection Supervisor
EEA	European Environment Agency
EASA	European Union Aviation Safety Agency
EFET	Enhanced Fish Embryo Test
EFSA	European Food Safety Authority
EFTA	European Free Trade Association
ELV	End-of-Life Vehicle
EMA	European Medicines Agency
EMAS	EU Eco-Management and Audit Scheme
EMS	Environmental management system
eMSCA	Evaluating Member State competent authority
ENVI	European Parliament's Committee on Environment, Public Health and Food Safety
EQS	Environmental Quality Standards
EUAN	EU Agencies Network
EUCLEF	European Chemicals Legislation Finder

Acronym	Description
EUON	European Union Observatory for Nanomaterials
EU-OSHA	European Agency for Safety and Health at Work
Forum	Forum for Exchange of Information on Enforcement
FTE	Full-time equivalent
FWC	Framework contract
GIME	Groupe Interinstitutionnel de Management Environnemental (Interinstitutional Group for Environmental Management)
GLP	Good Laboratory Practice
GN	EUAN Greening Network
GPP	Green Public Procurement
HelpNet	Network of national BPR, CLP and REACH helpdesks
HR	Human resources
IAC	Internal Audit Capability of ECHA
IAS	Internal Audit Service of the Commission
IATA	Integrated Approaches to Testing and Assessment
ICT	Information communications technology
IED	Industrial Emissions Directive 2010/75/EU
IMS	Integrated Management System
IPA	Instrument for Pre-Accession Assistance
IRS	Integrated Regulatory Strategy
ISG	Inter-Service Group
ISO	International Organisation for Standardisation
IT	Information technology
IUCLID	International Uniform Chemical Information Database
JEAP	Joint Evaluation Action Plan
JRC	Joint Research Centre
KPI	Key Performance Indicators
MB	Management Board
MCCP	Medium-chain chlorinated paraffins
MoU	Memorandum of Understanding
MS	Member State
MSC	Member State Committee

Acronym	Description
MSCA	Member State competent authority
NAM	New approach methodologies
NEA	National enforcement authority
NeRSAP	Network of REACH SEA and Analysis of Alternatives practitioners
NGO	Non-governmental organization
NPS	Net Promoter Score (IT / user satisfaction indicator)
NoI	Notifications of Intention
OECD	Organisation for Economic Co-operation and Development
OEL	Occupational exposure limit
OHT	OECD Harmonised Template
OSOA	One Substance, One Assessment
PAH	Polycyclic aromatic hydrocarbons
PARC	Partnership for the Assessment of Risks of Chemicals
PBT	Persistent, bioaccumulative and toxic
PCN	Poison Centre Notifications
PDN	Performance Development Network
PFAS	Per- and polyfluoroalkyl substances
PFCA	Perfluorocarboxylic acids
PI	Program Increment (agile / IT governance context)
PIC	Rotterdam Convention on the prior informed consent procedure (and the respective Regulation)
PMT	Persistent, mobile and toxic
POP	Persistent organic pollutant
POPRC	Persistent Organic Pollutants Review Committee
POPs	Persistent organic pollutants (and the respective Regulation)
PPORD	Product and Process Oriented Research and Development
PPP	Plant protection products
PPWR	Packaging and Packaging Waste Regulation
QSAR	Quantitative Structure-Activity Relationship
R4BP	Register for Biocidal Products
RAC	Committee for Risk Assessment

Acronym	Description
REACH	Registration, evaluation, authorisation and restriction of chemicals (and the respective Regulation)
REACH-IT	Central IT system providing support for REACH
REF	REACH-EN-FORCE (Forum-coordinated REACH enforcement project)
RFI	Radiative Forcing Index (environment / travel emissions)
RoHS	Restriction on Hazardous Substances Regulation
RoP	Rules of Procedure
SCBTH	Serious Cross-Borders Threats to Health
SCIP	Database for information on Substances of Concern In articles as such or in complex objects (Products)
SEAC	Committee Socio-economic Analysis Committee
SEV	Substance Evaluation
SLA	Service Level Agreement
SME	Small and medium-sized enterprises
SNE	Seconded national expert
SPD	Single Programming Document
SPC	Summary of product characteristics
SVHC	Substance of very high concern
SWACHE	Surveys on Willingness-to-Pay to Avoid Negative Chemicals-Related Health Effects
TA	Temporary agent
TG	Test Guideline
UNEP	United Nations Environment Programme
UFI	Unique Formula Identifier
UN GHS	United Nations Globally Harmonised System of classification and labelling of chemicals
US EPA	United States Environmental Protection Agency
vPvB	Very persistent and very bioaccumulative
vPvM	Very persistent and very mobile
WNT	Working Group of the National Coordinators of the Test Guidelines Programme
WPHA	Working Party on Hazard Assessment

Management Board analysis and assessment

The Management Board notes that the parts of the Annual Report 2025 prepared under the responsibility of the Executive Director fulfil the requirements of the ECHA Financial Regulation (Consolidated Annual Activity Report)[1].

Having regard also to the General Report adopted by the Management Board under the REACH Regulation (Part I of this Annual Report)[2], the Board considers that this report provides a comprehensive account of the activities carried out by ECHA during 2025, as well as the performance of the Agency against the expected inputs, outputs and outcomes defined in the Single Programming Document 2025-2027. It also represents a fair overview of the evolution of ECHA's budget, staffing, management, and its internal management system strategy and framework.

This assessment is based on the Board's analysis of all parts of the report, including the activities carried out, achievements, financial information, results of audits, retrospective evaluations, and the assessment of the internal control system, as well as the risks related to ECHA's activities together with the corresponding mitigating measures.

Achievements of the year

We consider that the performance and quality of the outputs in 2025 was high, as shown in Part I of the Annual Report.

2025 was a year of transition, preparation for upcoming responsibilities, organisational renewal and intensifying need for scientific-technical work. Prioritisation and early preparatory measures were taken to ensure continuity of high-quality outputs.

In assessing[3] the Consolidated Annual Activity Report of the Authorising Officer for 2025, we:

1. Welcome the strong and sustained collaboration with Member States, the European Commission, EU Agencies and stakeholders, which enabled the delivery of transparent, independent and high-quality scientific outputs, supported duty holders in meeting their obligations and underpinned the preparation for implementing expanding mandates for chemical safety policies. We also note the results of ECHA's stakeholder survey, which confirmed ECHA's reputation as a trusted, science-based authority, established a baseline for future benchmarking, and provided recommendations to guide further improvements.
2. Welcome the performance of the Risk Assessment Committee (RAC) and the Socioeconomic Analysis Committee (SEAC), issuing opinions on REACH authorisation applications exceeding initial estimates and further reducing backlogs.
3. Welcome the exceeded planned outputs of the Biocidal Products Committee (BPC), delivering more opinions than estimated, maintaining strong cooperation with Member States and the Commission, and proactively engaging stakeholders on complex regulatory processes.
4. Acknowledge the significant expansion of the ECHA CHEM platform in 2025, including the launch of the new Classification & Labelling Inventory and the broadening of scope to cover REACH, CLP, POPs and Drinking Water Directive regulatory activities, thereby reinforcing transparency and access to up-to-date chemical safety information.

[1] Article 48 of ECHA's Financial Regulation.

[3] Assessment pursuant to Article 48(1) of the Agency's Financial Regulation.

5. Welcome the timely progress in preparing for the implementation of new legislative tasks, including the readiness of IT tools for the receipt, processing and dissemination of notifications under the Drinking Water Directive, supported by the publication and update of support material for duty holders to be able to submit their notifications of intention, as well as the delivery to the Commission of the first phase of the Batteries Regulation scoping study.
6. Welcome targeted actions to improve Committee workability, including high-level engagement with Member States and Management Board discussions, resulting in improved membership levels.
7. Welcome an enhanced attention to maintaining ongoing contact with small and medium-sized enterprises (SMEs) to address their needs. In this context, the SME action plan was launched, the SME hub added to ECHA's website, and the first SME focus group convened.

Based on the periodical reporting and the Annual Report 2025 prepared by the secretariat, the Board makes the following **observations**:

1. ECHA supported the Commission throughout 2025 in the development of the proposal for an ECHA Basic Regulation, published in July 2025, aimed at strengthening ECHA's governance, increasing the sustainability of its financing model and providing a consolidated legal basis for tasks previously implemented under ad-hoc agreements.
2. ECHA provided scientific and technical input upon request to major EU policy and legislative initiatives in progress in 2025, most notably the One Substance, One Assessment (OSOA) package, including the establishment of the Common Data Platform and the advancement of inter-agency cooperation with partner agencies.
3. ECHA committees progressed intensive work on the EU wide restriction proposal for chromates and the broad per- and polyfluoroalkyl substances (PFAS) restriction proposal, which was possible as a result of the effective collaboration with the dossier submitters and the secretariat.
4. Despite the good performance of the Biocidal Products Committee, the progress with the Review Programme of existing active substances continued to be limited.
5. The continued improvement of harmonised enforcement of chemicals legislation across the EU is of increasing relevance and subject to increasing institutional and public expectations. In this context, ECHA's work to provide support to the Forum is of high value.
6. ECHA continued to support the EU's implementation of the Rotterdam and Stockholm conventions, providing scientific and technical support to the Commission including processing a high volume of notifications under the PIC Regulation and drafting a scientific dossier for a new POP listing and reviewing processes related to POPs in waste.
7. ECHA advanced further its commitment to New Approach Methodologies (NAMs) by progressing QSAR Toolbox development, supporting OECD QSAR Assessment framework implementation, expanding the evidence base for non-animal approaches and advancing non-vertebrate testing methods.
8. ECHA published nine new or updated Candidate List entries in 2025, with two additional entries adopted in December 2025 and published in early 2026.
9. A significant number of harmonised classification and labelling (CLH) dossiers were prepared and progressed in 2025 (95 proposals, with 41 RAC opinions adopted), reflecting strong impact in implementing EU policies for chemical safety, including work related to the new hazard classes under CLP.

Management

- The eight recommendations the Management Board provided for 2025 as part of the assessment of the 2024 Annual Report have been implemented or are in progress.
- 187 outputs were delivered out of the planned 195 in 2025. The challenges in delivering some of the outputs were mostly related a mix of internal constraints, including changes in teams' capacity, IT transition activities and the need to integrate parallel transformation initiatives, and external factors such as case complexity, and legislative timelines beyond ECHA's control.
- During the year, the organisational review progressed towards conclusion, resulting in a new organisational structure to ensure that the Agency maintains a high standard of implementation of EU policies and support to EU organisations and national authorities and is ready to deliver on its strategic goals including accommodating its expanding mandate, its growth in size and its digital and data transformation.

Budgetary and financial management

- We welcome the Agency's strong performance in implementing its budget, with a 99.0% commitment rate and 0.9% cancelled payment appropriation rate, and processing 89.1% of payments within legal deadlines, thereby exceeding the targets set for EU bodies.

Human resources management

- We commend ECHA for maintaining a 95.56% rate of filled establishment plan posts and for sustaining high workforce engagement, as demonstrated by an overall satisfaction index of 78.1 in the biennial staff satisfaction survey, alongside a continued focus on staff wellbeing, diversity and inclusion.
- We note that gender balance at middle and senior management levels is not achieved (28% female, 72% male at middle management level and 43% female, 57% male at senior management level).

Audit and retrospective evaluation results and follow-up on recommendations

- We received adequate information from, and assurance provided by the Internal Audit Capability (IAC) on audits, follow-up audits and the implementation of the recommendations, as well as appropriate information from the secretariat on the retrospective evaluations.
- The European Court of Auditors adopted a positive opinion regarding the 2024 annual accounts and made one observation regarding the financial year 2024 to which ECHA replied accordingly. There are no observations open from previous years.
- The European Parliament, as the Discharge Authority, granted discharge to the Executive Director with respect to ECHA's 2023 budget, including the decision on the closure of the 2023 accounts. The secretariat duly provided replies to the Discharge Authority's observations, and the implementation of the recommendations is on track.
- We note that the retrospective evaluation concluded that the Integrated Regulatory Strategy (2019–2023) largely met its objectives and delivered clear added value, notably by improving the prioritisation of substances of concern and supporting effective regulatory risk management, while identifying lessons to be carried forward under the 2024–2028 strategy.

Internal control framework and Integrated Management System

1. We consider that the internal control framework remains effective and functioning.
2. We take note of the maintenance of ISO 9001, ISO 14001 and EMAS certifications, alongside continued development of the Agency's management systems through regular Management Reviews and follow-up actions, with internal controls and risk assessments carried out in line with required policies.

Organisational risk management

- We highlight the importance of the continued development and application of the organisational Risk Management Policy.
- We found the regular updates on the Risk Register, including the continued specific reporting on the IT-security related risks, pertinent.
- We note that appropriate measures are in place to identify, monitor and manage risks threatening the achievement of ECHA's objectives. The secretariat regularly signalled significant risks and control issues to the Management Board, including as part of the Executive Director reporting, as well as the updates to the Agency Risk Register.
- We welcome specifically that ECHA maintained vigilance on cybersecurity risks and noted no high-impact security incidents. Any data breaches were handled timely and reported as required and mitigation actions put in place.
- We welcome the continued attention to preventing and managing the risk of actual, potential and perceived conflicts of interest, including the revision of the Policy and Procedure for the Prevention and Management of potential Conflicts of Interest, as well as regular trainings in this area for ECHA staff and members of ECHA bodies.

Management Assurance

The Board takes note of the systems in place to support the Executive Director's declaration of assurance and takes note of the declaration of assurance of the Executive Director.

The Board takes note of the fact that no reservations were made.

Recommendations for the secretariat for 2026

Based on our assessment, the Management Board requests particular emphasis in 2026 on the following actions, without prejudice to the implementation of the Single Programming Document 2026-2028:

1. Leverage the new organisational structure to embed strategic agility, strengthen governance, enhance scientific coordination, and ensure effective delivery across an expanding mandate, while strengthening engagement with the European Parliament and Member State partners to address information gaps, support informed decision-making, and maximise the impact of ECHA's scientific work.
2. Strengthen and safeguard the sustainability of RAC and SEAC by continuing to support the Committees' ability to deliver transparent, independent, high-quality and fit-for-purpose scientific outputs for both existing and new tasks, including by enhancing their competence and working structures, implementing targeted interim capacity measures and providing technical support upon request for the adoption of the Basic Regulation that contributes to ensuring long-term committee functioning. Continue to support and facilitate the preparation of the RAC/SEAC opinion on the UPFAS dossier.
3. Continue strengthening the Agency's readiness for the forthcoming responsibilities,

particularly those linked to the future Basic Regulation and the One Substance, One Assessment initiative. Continue proactive engagement with the Commission during legislative preparation to ensure smooth and effective implementation of the new mandates.

4. Continue to invest in cross-organisational digital, data and AI capabilities to accelerate the transition toward a more anticipatory, data-driven regulatory model, while improving stakeholder experience and evidence-based decision-making.
5. Continue supporting Member State competent authorities for biocidal products to accelerate progress in the Review Programme of existing active substances.
6. Continue the ongoing fine-tuning of the activity-based budgeting of the Agency as it will be crucial in the future against the background of tasks assigned to the Agency deriving from many pieces of legislation and the reforms envisaged in the basic regulation proposal to enhance the sustainability of ECHA financing model.
7. Continue the support to SMEs to comply with their legal obligations.
8. Continue supporting the implementation of the new CLP hazard classes, in particular the harmonised classification of endocrine disruptors and persistent pollutants identified as substances of very high concern (SVHCs) under REACH and other relevant regulatory areas, and provide support to the Commission in this regard.

Acknowledgments

The members of the Management Board express their appreciation to ECHA staff, members of ECHA bodies and the Agency's partners, in particular Member States, for their commitment and achievements in 2025.

Conclusion

In assessing the Annual Report 2025, the Management Board concludes that the overall performance of ECHA is in line with the objectives included in the Agency's Single Programming Document 2025-2027.

Based on the above observations, the Management Board requests that the Annual Report 2025 be forwarded to the Member States, the Court of Auditors, the Commission, the European Parliament, the European Economic and Social Committee and the Council.

Foreword

Dr Sharon McGuinness

Executive Director

I am pleased to present the Agency's annual report for 2025—a year marked by tangible outcomes for our Agency and stakeholders. Our continued focus on delivering robust results has ensured that we met our mandate whilst supporting partners in Member States, other EU institutions and organisations and collaborating with a wide range of stakeholders from industry, civil society organisation and trade unions.

This year, the Agency has again demonstrated a strong commitment to its mandate under EU chemicals legislation. Our performance is measured not only by our ability to deliver on expected results in the Single Programming Document 2025-2027, but also by our adaptability in the face of an evolving regulatory landscape.

Looking ahead, the growing pace of legislative activity means that ECHA must remain vigilant, flexible, and forward-thinking. We have taken in 2025 important steps to ensure that we are ready to implement new legislative mandates in areas such as One-Substance-One-Assessment (OSOA), Water legislation, Toys, RoHS or End of Life Vehicles.

In 2025, a comprehensive organisational review progressed towards conclusion to ensure ECHA remains agile and can respond effectively to new opportunities and challenges and the expanding scope of our work. These efforts position us to continue delivering on our mandate and purpose with confidence, ensuring we remain a trusted and effective partner for the years ahead.

Delivering the 2025 work programme required strong collaboration with our partners and stakeholders. I would therefore like to thank colleagues and contributors in the EU institutions, EU Agencies, Member State, Industry and civil society groups for their support and inputs throughout the year.

I would like also to extend my sincere thanks to all ECHA staff for their dedication and hard work throughout the year. The professionalism, expertise, and commitment of our teams have been fundamental to our achievements and progress. Together, we have built on our strengths and risen to new opportunities, ensuring the Agency continues to deliver meaningful results for our stakeholders and the wider European community.

Dr Sharon McGuinness
Executive Director

Executive summary

ECHA in brief

The European Chemicals Agency (ECHA) purpose is protecting human health and the environment through its work on chemical safety. As an EU decentralised agency operating under an evolving and increasingly complex regulatory landscape, ECHA delivers technical, scientific and administrative tasks essential to the implementation of EU chemicals legislation and policy. The Agency provides transparent, independent, and high-quality scientific opinions and decisions, serving as a foundation for Union-level measures. The Agency maintains robust governance and scientific procedures, actively collaborates with EU institutions, Member States, third countries, and international organisations. ECHA also supports industry—including small and medium-sized enterprises (SMEs)—by offering practical tools, advice, and guidance to help them meet their regulatory obligations. In addition, the Agency ensures that stakeholders and the public have access to relevant, reliable, and objective information on chemicals, underpinning transparency and trust in its operations.

The year 2025 – overview summary

ECHA's achievements in 2025 demonstrate a strong and sustained commitment to our expanding mandate, strategic goals and to our vision of advancing chemical safety through science, collaboration and knowledge.

Over the year, the Agency delivered high-quality scientific and regulatory outputs across all parts of its mandate, while substantially reinforcing preparations for a broad set of new responsibilities emerging from the EU's evolving chemicals and environmental legislation. In parallel, several major EU policy and legislative initiatives were progressing in 2025 where ECHA provided support to the legislative process, most notably the One Substance, One Assessment (OSOA) package, including the establishment of the Common Data Platform and a monitoring and outlook framework for chemicals and the advancement of inter-agency cooperation with partner agencies. This cooperation with partner agencies included working closely with other One Health agencies, namely the European Medicines Agency (EMA), the European Food Safety Authority (EFSA), the European Environment Agency (EEA) and the European Centre for Disease Prevention and Control (ECDC). We also adopted new or revised Memorandums of Understanding with the European Agency for Safety and Health at Work (EU-OSHA) and the European Union Aviation Safety Agency (EASA). The Commission's work on the REACH Revision also continued throughout the year, with ECHA providing technical and scientific input to support the legislative process and internal coordination mechanisms ensuring timely contributions.

The Commission's proposal for an ECHA Basic Regulation was published in July 2025 and aims to strengthen the Agency's governance, increase the sustainability of the financing model, and providing a consolidated legal basis for tasks previously implemented under ad-hoc agreements by the Agency, such as Occupational Exposure Limits (OELs), and Serious Cross Border Threats to Health (SCBTH). The proposal will, once adopted, strengthen the long-term sustainability of ECHA's scientific bodies, so that they remain capable of delivering high-quality, independent and timely scientific opinions across increasingly complex legislative frameworks. Throughout 2025 ECHA supported the Commission with this important legislative process.

These developments underline ECHA's growing strategic role at the centre of EU chemicals policy. Through its scientific opinions, regulatory decisions, data systems and cross-agency cooperation, ECHA contributes directly to core EU policy objectives: protecting human health and the environment, enabling safer products and a more circular economy, supporting innovation and competitiveness, and strengthening the scientific foundations of the decisions at EU level.

Throughout the year, we collaborated closely with Member States, the European Commission, EU Agencies, industry, civil society, and international partners. These partnerships contributed to the continued delivery of independent, transparent and robust scientific outputs while helping duty holders meet their legal obligations and preparing systems and stakeholders for newly emerging tasks. To further strengthen our engagement approach, we carried out ECHA's stakeholder survey in early 2025, establishing a baseline of how stakeholders view the Agency's transparency, scientific quality, and engagement practices. The survey confirmed that stakeholders broadly regard ECHA as a trusted, science-based authority with comprehensive and reliable information, and provided recommendations to guide future improvements. The outcome also establishes a baseline for future benchmarking.

At the same time, 2025 made clear both the many opportunities and challenges the Agency must navigate to sustain excellence: increasing scientific complexity, rising expectations, expanding mandates, new digital technology (for example, Artificial Intelligence (AI)) and timing mismatches between political decisions allocating new tasks and the arrival of resources. We addressed several of these risks proactively by progressing a major organisational review, strengthening Committee governance, scaling up data and digital capacities, and enhancing cross-agency coordination.

Strategic Goal - a Trusted Chemicals Agency

As the EU Chemicals Agency, we work continuously to be trusted and reliable as we implement chemical regulations and protect health and the environment through our work on chemical safety. A key priority for the Agency is to deliver transparent, independent and high-quality scientific opinions and decisions as required under our legal mandate. Most of the operational targets in this area were met or exceeded in 2025.

Under the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation and the Classification, Labelling and Packaging (CLP) Regulation, our committees sustained a high level of opinion making activity. The Risk Assessment Committee (RAC) and the Socioeconomic Analysis Committee (SEAC) issued 40 opinions on applications for authorisation of substances of very high concern (SVHCs), exceeding planned targets and further reducing existing backlogs. A significant number of harmonised classification and labelling (CLH) dossiers were prepared and progressed in 2025 (95 proposals, with 41 RAC opinions adopted), reflecting strong impact in implementing EU policies for chemical safety, including work related to the new hazard classes under CLP. Work on restrictions continued intensively, including on the EU wide restriction proposal for chromates, which was prepared by ECHA on behalf of the Commission, and on the broad per- and polyfluoroalkyl substances (PFAS) restriction proposal initiated by five Member States. At the Commission's request, we also supported the decision-making phase for four restriction proposals: PFAS in firefighting foams, lead in shooting and fishing, calcium cyanamide and creosote.

In 2025, nine new or updated entries were added to the Candidate List of substances of very high concern, reflecting prioritisation choices and timing constraints. The substances included several persistent and bioaccumulative chemicals, notably three substances identified as very persistent and very bioaccumulative (vPvB), as well as substances meeting the criteria for persistence, bioaccumulation and toxicity (PBT) and substances toxic for reproduction. Furthermore, one substance was identified as a first neurotoxicant SVHC.

In the biocides domain, the Biocidal Products Committee (BPC) exceeded planned outputs, delivering more opinions than estimated on active substance approvals, Union authorisations and related changes. Collaboration with Member States and the Commission remained strong, with a high level of satisfaction reported. The Agency proactively engaged with stakeholders on complex regulatory processes such as the review of ethanol as an active substance.

For other legislative tasks, RAC issued five opinions on Occupational Exposure Limits as planned.

Under international conventions, ECHA continued to support the EU's implementation of the Rotterdam and Stockholm conventions. With regards to the EU Prior Informed Consent (PIC) Regulation, ECHA provided technical and scientific support to the Commission, we also processed 11 997 export notifications, 1 417 import notifications and 2 638 explicit consent responses. With regards to the Persistent Organic Pollutants (POPs) Regulation, the Agency drafted a full scientific dossier for a new EU proposal to list a potential POP under the Convention, and reviewed processes to reflect the new mandate concerning POPs in waste.

As part of our efforts to enhance decision-making and policy development through better use of data, we continued implementing our new data management approach, further maturing our data governance framework. We also advanced the development of the Chemical Identifiers Data Management System, releasing its first component in December 2025 to streamline the consistent management of identifiers across regulatory processes.

Throughout 2025, we expanded the ECHA CHEM platform significantly. In May, the new Classification & Labelling Inventory was launched on the platform, and in September its scope was broadened to include information on REACH, CLP, POPs and Drinking Water Directive regulatory activities. Work continues to expand the system's coverage and usability, reinforcing transparency and access to up-to-date chemical safety information.

Work on the Integrated Regulatory Strategy (IRS) continued to ensure a strong knowledge base on chemicals in our databases. We screened newly registered substances above 100 tonnes, concluded further assessments under the Assessment of Regulatory Needs and progressed towards risk management for (groups of) substances.

In 2025, the Forum continued to strengthen harmonised enforcement of EU chemicals legislation across Member States. It coordinated ten enforcement projects and several pilots. The Forum also agreed the theme of the next EU wide REACH enforcement project on the safe use of chemicals in workplaces and started preparations with occupational safety and health inspectors. A cooperation with the Directorate-General for Taxation and Customs Union (DG TAXUD) and the Customs Laboratories European Network (CLEN) was established identifying activities for collaboration with the aim to harmonise and enhance enforcement capacities at the EU level concerning chemicals legislation specially when it comes to the compliance of imports.

ECHA maintained the independence and transparency of its scientific and regulatory work, addressed proactively and openly the public criticism related to a procurement for scientific background research, and completed a review and update of its conflict-of-interest prevention policy.

Strategic Goal - Respond to Emerging Challenges and Changes in Our Legal Landscape

In 2025, we continued to prepare for the expansion of ECHA's mandate, driven by ongoing EU legislative developments. Anticipating the adoption of new legal acts, the Agency proactively organised its structures and processes so that implementation can begin as soon as legislation enters into application and the necessary resources are allocated. This preparation covered technical, scientific, procedural and stakeholder-engagement aspects.

Collaboration under the One Health and One Substance, One Assessment initiatives deepened. We expanded joint work with partner agencies—including EFSA, EEA, EMA and ECDC—through regular information exchange and coordinated scientific efforts. Notably, we worked with EFSA on developing harmonised approaches for risk assessment of plasticisers, with further case studies prepared for completion in 2026.

Our broader One Health cooperation progressed through joint initiatives addressing crosscutting issues such as chemical exposures, antimicrobial resistance and environmental impacts. ECHA supported the One Health framework of action, led key tasks to facilitate early interactions between agencies, and contributed to staff exchange mechanisms and joint communication efforts.

We advanced preparations for new tasks under several major frameworks, including the Batteries Regulation, the Drinking Water Directive (DWD), the Water Framework, Groundwater and Environmental Quality Standards Directives (pending adoption), the Industrial Emissions Directive (Best Available Techniques Reference Document (BREF) processes), the Packaging and Packaging Waste Regulation (PPWR), the Toys Regulation, the Restriction of Hazardous Substances (RoHS) Regulation, the End of Life Vehicles (ELV) Regulation and the One Substance, One Assessment legislative package, which will introduce a Common Data Platform, create new tasks in the area of monitoring and outlook framework, and reassign several regulatory tasks to ECHA. Throughout the year, we delivered technical and scientific support to the Commission during negotiations and legislative preparation.

Under the Drinking Water Directive, a RAC Working Group continued to operate throughout 2025, and the procedures, templates and workflows for RAC opinion forming were developed. In parallel, IT systems for handling notifications and applications continued to be developed, in line with ECHA's IT strategy, with the DWD solution serving as the pilot for the Agency's future IT architecture, paving the way for more modular and harmonised digital systems. By year end, the new DWD notification solution was launched on time to meet the regulatory deadline of 1 January 2026. Guidance documents for applicants and authorities were published in early 2025, and a well-attended DWD stakeholders' workshop was held in October.

Delivering new tasks also required extensive engagement with new stakeholder communities across the various legislative domains and in this regard, we organised multiple workshops and meetings to ensure early alignment, transparency and smooth onboarding for all actors involved.

Strategic Goal - Communicate and Engage

Efforts to strengthen communication and stakeholder engagement continued to be a core part of our operations in 2025. Throughout the year, ECHA reinforced cooperation, increasing interactions with EU institutions and Member States in line with the growing political visibility of chemicals policy.

In 2025, stakeholder confidence in ECHA's work was further reinforced through the stakeholder survey, launched and completed early in the year. The survey delivered clear benchmarks on how ECHA is viewed across stakeholder groups and provided valuable recommendations for strengthening engagement. These findings are now feeding into different follow-up initiatives guiding ongoing improvements in ECHA's engagement approach with the aim to see improvements in the next survey in 2027.

We continued to engage stakeholders with diverse interests, ranging from public health and environmental protection to industry and animal welfare concerns and to employee groups, systematically across regulatory processes, including through workshops, targeted meetings and bilateral dialogues. This approach enhanced transparency, strengthened trust and supported the consistent uptake of scientific and regulatory developments across sectors.

We strengthened our institutional cooperation framework in 2025 by concluding a new Memorandum of Understanding with EU-OSHA and revising our Memorandum of Understanding with the European Union Aviation Safety Agency (EASA), further reinforcing collaboration on crosscutting chemical safety, worker protection and related issues.

Technical collaboration with EFSA also advanced through work on the International Uniform Chemical Information Database (IUCLID), including ongoing development of formats and validation rules for food related applications such as Food Contact Materials, following the release of IUCLID formats for these materials in 2025.

Overall, our strengthened engagement, joint scientific initiatives and enhanced cooperation mechanisms across agencies and stakeholder groups ensured that ECHA's communication and partnership work in 2025 was more integrated, future oriented and aligned with the broader EU goals on public health, environmental protection and sustainable chemicals management.

Strategic Goal - Lead on Chemical Knowledge and Expertise

In 2025, we continued to strengthen our commitment to New Approach Methodologies (NAMs) by advancing scientific, regulatory and stakeholder-oriented work to reduce reliance on animal testing. Development of the Quantitative Structure-Activity Relationship (QSAR) Toolbox progressed, with new information and models released in August 2025 and promoted through an ongoing outreach campaign. We also supported the implementation of the Organisation for Economic Co-operation and Development (OECD) QSAR Assessment Framework, organising a well-attended webinar with around 500 live participants and over 1 100 subsequent views, and presenting the framework in several scientific fora.

Our activities to expand the evidence base for non-animal approaches advanced through the development of several new QSAR models—covering, for example, acute oral and aquatic toxicity—and further conceptual and modelling work on toxicokinetics. We also supported progress in nonvertebrate methods, including through the development of the enhanced Fish Embryo Test (EFET).

We continued contributing to the Commission's roadmap to phase out animal testing, providing input in interservice groups, working groups on human health and environment, interagency coordination, and stakeholder dialogues. In June, we co-organised a successful workshop with the Commission to support roadmap implementation, receiving very positive feedback from participants.

International cooperation remained a central component of our work. ECHA reviewed its international activities in 2025 and continued to implement its Instrument for Pre-accession Assistance (IPA) support work, delivering all planned actions, workshops and bilateral meetings under the ongoing grant while initiating preparations for the next agreement. We supported a broad range of OECD activities, including the Chemicals and Biotechnology Committee, the development of omics sampling guidance through the Working Group of National Co-ordinators of the Test Guidelines Programme (WNT) and the Working Party on Hazard Assessment (WPHA) programmes and contributions to two Integrated Approaches to Testing and Assessment (IATA) case studies. Bilateral engagement with the United States Environmental Protection Agency (US EPA) and Canada continued under the Accelerating the Pace of Chemical Risk Assessment (APCRA) initiative, focusing on aquatic toxicity NAMs and omics-based substance grouping. We also supported the Commission's work within the United Nations (UN) Subcommittee of Experts on the Globally Harmonised System (GHS).

To strengthen regulatory uptake of NAMs across the EU, we enhanced cooperation with EFSA, holding quarterly meetings on NAM related topics and developing harmonised approaches for reducing animal testing requirements. We also supported Member States in applying NAMs, including in pilot cases for SVHC groups and POPs through toxicokinetics profiling.

Through the Partnership for the Assessment of Risks from Chemicals (PARC)[4], we contributed to several projects and published the updated Key Areas of Regulatory Challenge report, outlining priority research needs to address scientific and regulatory gaps in chemical safety. This work helps foster the development and acceptance of advanced methodologies across regulatory frameworks.

Strategic goal - Invest in Our People and Organisational Excellence

In 2025, we continued to invest in our people and organisational development by implementing the actions under the People and Organisational Strategy 2024–2028, supported by the updated Wellbeing Action Plan 2025–2026 and ongoing work under the Diversity and Inclusion Action Plan. Workforce engagement remained high, and stability continued to be a strength: 95.56 % of establishment plan posts were filled, above the target and reflecting successful recruitment and employer branding efforts. The biennial staff satisfaction survey also showed excellent results, with 94% participation.

During the year, the organisational review progressed towards conclusion, resulting in a new organisational structure to be implemented in early 2026. This renewed structure is designed to strengthen governance, scientific coordination, data and IT integration, committee support and stakeholder engagement—ensuring the Agency can deliver effectively on an expanding mandate and future challenges. As part of adapting to new working methods, we continued a pilot on optimising use of the office building and conference centre.

ECHA again delivered high quality meeting services in 2025, supporting a very high number of hybrid and online events, including major scientific and stakeholder meetings, committee sessions, training events and international engagements.

Financial management remained strong despite continued uncertainty around fee income. Through close monitoring and proactive adjustments, we achieved a 99% commitment rate and an 89.1% payment rate, exceeding the targets set for EU bodies. The European Court of Auditors provided a clean audit opinion on ECHA's 2024 accounts, with one observation to which the Agency replied accordingly, and made no observations on the first stage of its 2025 audit.

Our multiyear investment in digital transformation also advanced significantly. Following the approval of the five-year IT vision and roadmap, implementation continued at pace. The Agency completed the transition to public cloud infrastructure in June 2025, modernised core administrative tools, and further progressed towards a modular IT architecture — most notably through the work on the DWD IT solution and ECHA CHEM.

To ensure strong governance of emerging technologies, we strengthened our horizontal approach to Artificial Intelligence (AI). The dedicated AI coordination group delivered internal guidelines for the safe and ethical use of AI, assessed use cases, and prepared several pilot projects that began later in the year. This work supports ECHA's broader aim to harness advanced technologies safely and efficiently while ensuring transparency, data protection and scientific integrity.

ECHA maintained vigilance on cybersecurity risks, reported routinely to the Management Board and noted no high-impact security incidents. Any data breaches were handled timely and reported as required and mitigation actions put in place.

[4] PARC is a seven-year EU wide research and innovation programme under Horizon Europe which aims to advance research, share knowledge and improve skills in chemical regulatory risk assessment.

Current and future challenges and opportunities

In 2025, ECHA operated in an environment shaped by expanding legal mandates, rising scientific complexity, and heightened expectations from EU institutions, stakeholders, and society. The year demonstrated the Agency's capacity to deliver under pressure—but also exposed structural challenges that must be addressed to ensure long-term strategic resilience.

Despite this strong performance, a limited number of outputs progressed more slowly than planned, driven by a mix of internal constraints, including changes in teams' capacity, IT transition activities and the need to integrate parallel transformation initiatives, and external factors such as case complexity, and legislative timelines beyond ECHA's control. This affected, to varying degrees, parts of dossier evaluation work, updates to eChemPortal and NAMs datasets, preparatory work under upcoming water legislation, and horizontal initiatives such as the Accredited Stakeholder Organisation (ASO) review. Furthermore, despite the good performance of the Biocidal Products Committee, the progress with the Review Programme of existing active substances by Member States continued to be limited.

RAC and SEAC remain central to ECHA's credibility, yet their workloads increasingly exceed sustainable levels. Despite improvements in Member State nominations in 2025, the committees continued to face capacity gaps relative to the complexity and volume of dossiers. These pressures heighten the risk of overstretch, making the forthcoming Basic Regulation—and any provisions it includes for committee functioning—critical to long term viability. In the short term, the Agency will need targeted interim measures, stronger prioritisation, and closer coordination with Member States to safeguard opinion quality and timelines.

The PFAS restriction and other major scientific files illustrate the increasing scale and complexity of cases handled by ECHA, including those that are politically sensitive, scientifically complex, and data intensive. Maintaining independence, transparency, and methodological robustness and quality under such scrutiny remains essential. This also underlines the need for state-of-the-art scientific methods, from NAMs to advanced data analytics.

The Agency is expected to operationalise significant new responsibilities, partly before dedicated resources arrive. This gap creates a timing mismatch between political decisions and operational readiness. Strategically, this calls for a whole Agency approach to prioritisation, early preparatory work, and systematic impact assessment of tasks deriving from new legislation to avoid crowding out core regulatory functions.

The organisational review completed in 2025 positions ECHA for a more integrated and resilient future operating model. By strengthening governance, enhancing scientific coordination, and creating cross organisational structures (including those dedicated to science and AI), the Agency is making a strategic shift from incremental adaptation to futureproof institutional design. Implementing the new structure from early 2026 creates an opportunity to embed strategic agility, reinforce governance and stakeholder engagement, and better align mandates, resources, and competencies.

Even as challenges deepen, 2025 has opened important strategic and organisational opportunities for the Agency.

The political momentum around the Basic Regulation and OSOA creates an unprecedented opening to modernise ECHA's mandate, reinforce committee sustainability, and clarify its long-term role in the EU regulatory system.

The 2026 organigramme can become a catalyst for streamlining cross-agency delivery of our mandate, building scientific excellence, and embedding innovation across the Agency. With new cross organisational capabilities—including for digital transformation, data, AI and advanced science—ECHA can move decisively toward a more anticipatory, data driven regulatory model.

A modern IT and data landscape will not only enhance internal workflows but also improve the user experience, stakeholder trust, and evidence-based decision-making.

The increased strategic relevance of chemicals policy more broadly offers opportunities to strengthen partnerships with Commission services, Member States, international bodies, and third countries—supporting more coherent global chemical safety approaches and amplifying EU leadership.

Taken together, 2025 was not just a "business-as-usual" year. It represented a period of transition, preparation for upcoming legislative responsibilities, organisational renewal, and intensifying scientific demands. These developments collectively reinforce ECHA's long-term strategic positioning at the centre of EU chemicals regulation.

Part I. Achievements of the year

Dossier preparation[5]

Objective 1: Companies supported on inquiries and data sharing

Main Outputs	Execution	Status
Inquiries and disputes on data sharing are handled in line with legal requirements and timelines.	Inquiries and disputes over data sharing were handled according to legal requirements and timelines, ensuring a smooth process for all parties involved. ECHA continued to support companies with the tools and guidance they need to successfully register and update their information.	✓Yes

Indicators	Estimate	Actual
Number of inquiries received	5 000	5131
Percentage of data sharing disputes handled within legal deadline	100	100

Objective 2: Harmonised IT tools are available to support the transparent sharing of harmonised data between industry and regulatory authorities

Main Outputs	Execution	Status
IUCLID and Chesar are updated to incorporate existing, new and changing regulatory requirements.	Significant updates to IUCLID were made to meet new EU and international regulatory requirements. These included new formats, validation, and filtering rules to ensure the database remains aligned with diverse regulatory needs. Chesar 3 was updated and preparations for the new Chesar Platform Beta release were made. The Beta release was postponed to January 2026, to better serve stakeholders (avoiding the holiday period).	✗No
Promotion of IUCLID as the international harmonised format for chemical data continued.	As an increasing number of international authorities adopt IUCLID as the reference implementation of the OECD Harmonised Templates (OHTs), ECHA continued to	✓Yes

[5] This section covers only REACH registration dossier preparation. The support to the preparation of other REACH and CLP dossiers are covered by the relevant sections.

	collaborate with the OECD by participating in meetings and supporting members in exchanging and managing data using IUCLID.	
IUCLID progressively updated to support the needs of OECD and international partners.	IUCLID was updated as required and promoted as the standard for chemical data worldwide.	✓Yes
Scientific contribution made to development of the OECD harmonised test guidelines relevant for the EU information requirements.	The Agency co-lead on the targeted revision of OECD TG 443 (EOGRTS) and led the update of seven test guidelines where optional cryopreservation of samples for omics analysis was included. Input was also provided to other test guidelines and guidance documents on the OECD agenda.	✓Yes

Indicators	Estimate	Actual
Timeline for release of version 1.0 of Chesar Platform for REACH and Biocides	Q2	n/a
Number of regulatory processes maintained in IUCLID	55	55
Number of OECD IUCLID expert group meetings attended and supported	2	3
Number of test guidelines supported	2	12

Dossier submission and processing

Objective 1: Access to market for duty holders continues to be streamlined and predictable

Main Outputs	Execution	Status
PPORD notifications processed, and data analysed to identify and monitor innovation and new chemicals trends.	PPORD notifications were monitored and analysed to track innovation trends and new chemical developments.	✓Yes
The verification of the size of SME companies continues and the time lag between submission and beginning of the verification is further reduced.	The annual target was exceeded with 408 verifications completed (target: 400). Efficiency gains are evident as the time lag has been further reduced, with verification for 2024 registrants already underway.	✓Yes
Ongoing work on the implementation of the ex-ante SME verification process, including updates of guidance and tools,	Following the REACH Fees Regulation publication in October, efforts focused on the analysis of the new process, building necessary implementation and IT tool and establishing the implementation timeline to	✓Yes

before it is launched by mid-2026.	meet the 5 February 2027 launch of SME ex-ante process.	
Registrations invalidated as necessary. Corresponding tools and processes for invalidation of registrations developed further for different circumstances, such as to facilitate compliance of registrations with Article 50(3) and the implementation of EU sanctions, etc.	Through continuous improvement, tools and procedures were refined for various scenarios. Efficiency and consistency were enhanced for the revocation in cases of non-existing companies.	✓Yes
Classification and labelling (C&L) notifications processed.	All C&L notifications were processed within established timelines. In 2025, the volume of C&L notifications began to stabilize following the unprecedented surge of the previous year. While the actual submission numbers remained above initial estimates with 117 227 submissions compared to an estimate of 35 000, they showed a marked decrease compared to 2024.	✓Yes
Registration dossiers processed.	The processing of registration dossiers remained on track, maintaining a steady flow of data and ensuring that all incoming submissions were handled within the required timelines.	✓Yes
Positive registration decisions issued.	Completeness checks were performed on all received registration dossiers within legal deadlines and positive decisions were issued for complete submissions. Around one third of the submissions triggered manual checks, in line with previous years.	✓Yes
Negative registration decisions issued.	Negative decisions were issued where registrants failed to provide complete data or pay the registration fee.	✓Yes
New substances registered.	The number of substances registered for the first time in 2025 was in line with the estimate, and showed a stable trend compared with previous years.	✓Yes
High tonnage substances registered.	The number of substances registered >100tpa in 2025 was in line with the estimate, and showed a stable trend compared with previous years.	✓Yes

Indicators	Estimate	Actual
Number of PPORD notifications received	240	275

Time lag between submission and beginning of SME verification process	2 years	1 year
Number of verifications of SME Registrants' size decisions issued	400	408
Timeline for having implementation plan for ex-ante SME verification process in place	Q1	Q4
Number of invalidation/revocation decisions issued	150	206
Number of C&L notifications received	35 000	117 227
Number of REACH registration dossiers received (initial & updates)	15 000	13 978
Percentage of REACH registration dossiers handled within legal deadline	100	100
Percentage of registration dossiers verified with manual completeness check	30	31
Number of update requests following completeness check	900	639
Number of confidentiality request decisions issued	100	100
Number of registration invoices issued	5 500	5 877
Number of positive registration decisions issued	14 000	13 600
Number of negative registration decisions issued	120	151
Number of new substances registered - (i.e. first time on the EEA market above 1tpa)	350	362
Number of substances registered for the first time above 100tpa	50	40

Objective 2: Submission activities are user-focussed, streamlined and adaptable

Main Outputs	Execution	Status
ECHA's solution for new submission types (with focus on DWD).	The Industry Portal was launched on 8 December 2025. The system was fully operational and ready to receive DWD Notifications of Intention (NoI) by 5 January 2026.	✓Yes
Engagement actions with users of the ECHA's submission systems.	Engagement was maintained through the Industry User Group and specific training for DWD NoI, ensuring stakeholders are equipped to use the new systems.	✓Yes

Indicators	Estimate	Actual
Timeline for finalising new submission solution for DWD	Q2	Q1
Number of Workshops/Meetings organised with users of the ECHA's submission systems	2	2

Identification and prioritisation of (groups of) substances

Objective 1: Prioritisation of regulatory actions on (groups of) substances is coordinated with the Commission and Member States

Main Outputs	Execution	Status
Shortlists of (groups of) substances provided to support the Commission and Member States bringing forward candidates for CLH, SVHC identification, and restriction.	About 70 substances (as groups or single substances) were shortlisted and provided to Member States as potential candidates for harmonised classification. Six groups were further assessed by ECHA as potential candidates for restrictions. For three of them it was concluded that no further regulatory risk management is currently needed; the other three are potential candidates for future restrictions.	✓Yes

Indicators	Estimate	Actual
Number of groups of substances provided as candidates for CLH and restriction	5	15
Number of new substances added to the Registry of Intention (SVHC, CLH, Restrictions) originating from ARNs	15	53

Objective 2: Good knowledge on ECHA's chemical database is maintained

Main Outputs	Execution	Status
Project to systematically screen all substances registered above 100 tonnes after 2018 (tonnage upgrades and new registrations) commenced.	Screening was completed for 119 substances registered in 2024 at >100tpa (tonnage upgrades and new registrations). For 18 of these substances, a potential need for CLH or restriction was identified.	✓Yes
ARNs concluded when information from compliance checks becomes available, to inform on the need (or not) for the anticipated risk	Three ARNs were concluded and published on the website after information from compliance checks was generated, all confirming that no further regulatory risk	✓Yes

management.	management actions are currently needed.	

Indicators	Estimate	Actual
Number of substances above 100 tonnes screened	100	119
Percentage of relevant ARNs concluded and update published to the website	100	100

Objective 3: Co-operation and transparency on authorities' activities is further enhanced

Main Outputs	Execution	Status
Plans and priorities for ongoing and future work between Member States, ECHA and the Commission shared through RiME+ and other mechanisms (Heads of Chemicals Authorities).	Four (physical and remote) RiME+ meetings were held to address issues such as: preparations for possible future restrictions and harmonised classifications (including prioritisation and collaboration); discussions on the CLH shortlist and several restriction pilot projects; improving coordination in the one substance, one assessment context. EMA and EFSA were invited to join the RIME+ meetings on a regular basis, for topics of mutual relevance (such as work on common substances).	✓Yes
Targeted support to Member States on e.g. pilot projects on restrictions and related to RiME+ discussions (e.g. on technical questions related to grouping and read-across).	Support was provided to Member States upon request for several potential CLH dossiers; requests for extracting information from the ECHA databases and disseminated information were also supported.	✓Yes
ACT and its integrated tracking list further developed to facilitate sharing of priorities and co-operation among authorities.	Minor improvements were implemented, e.g. further developing the search functionalities (based on the feedback received from the Member States). The necessary maintenance work to ACT and the tracking list was implemented as planned.	✓Yes

Indicators	Estimate	Actual
Number of RiME+ meetings organised	4	4
Number of requests for support from Member States in the context of RiME+ discussions addressed	5	6
Timeline for the update of ACT	Q4	Q2, Q4

Objective 4: Collaboration with ENVI agencies is further enhanced under the One Substance, One Assessment and One health initiatives

Main Outputs	Execution	Status
Collaboration with EFSA and EMA in the framework of One Substance, One Assessment continued.	Meetings were held with both EFSA and EMA in relation to One Substance, One Assessment and One Health to discuss amongst others, cross cutting issues and common substances.	✓Yes
One Health framework of action supported.	One Health action plan was supported by leading two tasks: i) facilitating early interaction and cooperation between the Agencies and ii) staff exchange. Input was also provided to several other actions. In addition, the Agency supported the One Health Task Force to promote the One Health topic.	✓Yes
Pilots on prioritising actions on common substances across different legislations initiated, considering the synergies between the existing and new tasks within ECHA's mandate.	ECHA assessed whether obstacles in sharing confidential data with other Agencies encountered in the past would be fully solved by the Data Regulation. Considerable work has been carried out, still some further work will be needed, with the aim to finalise the pilot in Q1 2026.	✓Yes
Support to EFSA mandate to assess exposure to plasticisers in food contact materials provided.	ECHA collaborated with EFSA to develop approaches for the risk assessment of plasticisers in relation to estimation of aggregated exposure from both dietary and non-dietary sources. The Agency carried out a literature review on non-dietary exposures, performed gap analysis for the substances and developed Tier I assessment for non-dietary exposure. ECHA also reached alignment with EFSA on the case studies to be elaborated in 2026.	✓Yes

Indicators	Estimate	Actual
Number of bilateral governance meetings on OSOA to review and align approaches for common substances and cross cutting topics	6	7
Number of projects related to One Health framework under the leadership of ECHA initiated	2	2
Number of pilot projects on prioritising actions on common substances across different legislations initiated to improve consistency of regulatory outputs	1	1

Timeline for support to EFSA provided in line with the relevant Commission mandate	Q1-Q4	Q1, Q2, Q4

Evaluation[6]

Objective 1: Dossier evaluation is impactful, efficient and scientifically and legally robust

Main Outputs	Execution	Status
Evaluation targets and indicators delivered in line with legal requirements and the recommendations from the Joint Evaluation Action Plan (JEAP).	Number of the evaluation targets and indicators were delivered in line with legal requirements and the recommendations from the JEAP but due to changes in teams' capacity and IT issues in the first half of the year not all targets and indicators were met: - 190 CCH cases concluded, 8 more draft decision to be sent early 2026. - 208 final decisions on CCH - 180 CCH decisions concluded at Follow-up evaluation, 8 more conclusions to be finalised early 2026. - 70 Testing proposal draft decisions sent.	✗ No
National enforcement authorities informed in case of non-compliance with the decision and follow-up decisions drafted where appropriate.	All Failure to Respond notifications were communicated to national enforcement authorities without delay.	✓ Yes
Updated recommendations and regulatory advice provided to registrants stemming from evaluation report published and communicated.	Updated Recommendations to registrants were published on our website in Q1.	✓ Yes
Targeted study audits requested in case a concern about compliance with principles of Good Laboratory Practice (GLP) is identified by ECHA or a Member State.	In total 12 study audits were requested, including one concern triggered study audit and 11 random study audits.	✓ Yes

[6] Title VI of Regulation (EC) No 1907/2006

Indicators	Estimate	Actual
Number of compliance checks concluded: draft decisions or no action	200	190
Number of final decisions on compliance checks	200	208
Number of compliance check decisions concluded in the follow-up to dossier evaluation	200	180
Number of testing proposals draft decisions issued	50	70
Percentage of Failure to Respond notifications communicated to NEAs without delay	100	100
Timeline for publication of Article 54 report	Q1	Q1
Number of study audits requested	<5	12

Objective 2: Substance Evaluation by Member States becomes more efficient and effective

Main Outputs	Execution	Status
Updates of the Community rolling action plan (CoRAP) proposed to the Member State Committee (MSC) for substances where substance evaluation is the most appropriate tool to generate further hazard information.	The CoRAP 2025-2027 was published in March 2025 and the draft CoRAP update for 2026-2028, referred to the MSC in November, was introduced to the MSC in December (MSC-92).	✓Yes
Member States advised and supported in achieving substance evaluation conclusions as fast as possible.	The estimate of 10 substance evaluation final decisions issued was surpassed.	✓Yes
Support provided to Member States to adopt the appropriate regulatory risk management measures and initiatives.	Project to review proposals for RMM in past SEV conclusions was presented to MSC in December (MSC-92).	✓Yes
Substance evaluation cases currently opened reduced further.	The number of open SEV cases was reduced by 7%.	✓Yes
Substance evaluation cases concluded.	As less SEV cases remain open, the number of concluded cases per year is also decreasing.	✓Yes

Indicators	Estimate	Actual
Timeline for publication of CoRAP	Q2	Q1
Number of substance evaluation final decisions issued	10	12
Timeline for providing status update to Member States related to substance evaluation	Q4	Q4
Percentage of open substance evaluation cases	5	7
Number of substances for which a conclusion was reached in substance evaluation	25	14

Authorisation[7]

Objective 1: Substances of very high concern identified, recommendations for inclusion in Annex XIV and applications for authorisation progressed

Main Outputs	Execution	Status
Substances of very high concern identified and included in the Candidate List.	In 2025, nine new or updated entries were published in the Candidate List, bringing the total in 2025 to 251 entries.[8]	✓Yes
Applications for authorisation processed and progressed in line with agreed approach.	The number of applications for authorisation/review reports newly submitted to ECHA continued to decrease in 2025, with 14 uses applied for (12 applications/review reports). ECHA continued to initiate and progress opinion-making on pending applications and review reports at a maximum capacity, thereby further reducing the existing backlog.	✓Yes
12th recommendation for substances to be included in Annex XIV submitted to the Commission and published on ECHA website within the legal timelines.	The 12th recommendation was completed and sent to Commission on 18th November.	✓Yes

[7] Title VII of Regulation (EC) No 1907/2006
[8] Two additional entries were adopted in 2025 and published in February 2026. They will be reflected in the Annual Report 2026.

Indicators	Estimate	Actual
Number of new and updated entries published in the Candidate List	15	9
Number of applications for authorisation and review reports submitted to ECHA (number of uses)	<60	14
Number of applications for authorisation and review reports for which opinion-making is initiated and progressed (number of uses)	40	34
Timeline for submission of 12th Annex XIV recommendation to the Commission and publication on the website	Q4	Q4

Objective 2: Opinions of the Committees for Risk Assessment (RAC) and Socio-Economic Analysis (SEAC) are timely and fit-for purpose

Main Outputs	Execution	Status
Opinions on applications for authorisation delivered to Commission.	The scientific Committee for Risk Assessment (RAC) and the Committee for Socio-Economic Analysis (SEAC) delivered opinions on applications for authorisation of 40 uses of substances (vs. 35 as initially estimated). In addition, SEAC delivered all addenda to earlier opinions on applications for authorisation requested by the Commission's. 97.5% of the authorisation applications/review reports opinions (i.e. 39 out of 40) were delivered within the legal deadlines, while the addenda were all delivered within the timeline agreed with the Commission.	✓Yes
Participation in workshops and network meetings facilitated as necessary, to develop methodologies and enhance the capacity of Member States and companies to carry out analysis of alternatives and socio-economic analysis with view of finding viable alternatives.	ECHA co-organised and hosted the 13th meeting of the Network of the REACH Socio-Economic Analysis and Analysis of Alternatives Practitioners (NeRSAP) at the Agency's premises. Additionally, ECHA staff participated as panellists in SEA-related sessions at the SETAC Europe Annual Meeting and the Annual Conference of the European Association of Environmental and Resource Economists - EAERE. ECHA also continued to participate in the OECD Working Party on Risk Management, as well as in other networks of environmental and health economists. To support and promote substitution, ECHA continued to focus on providing relevant information and training on the Agency's dedicated webpages. This included online training module and the key information on potential alternatives	✓Yes

	identified in AfA dossiers.	

Indicators	Estimate	Actual
Number of RAC and SEAC opinions adopted on applications for authorisation and review reports (number of uses) and submitted to the Commission	35	40
Percentage of opinions on applications for authorisation and review reports submitted to the Commission within legal deadline	100	97.5
Number of opinions on applications for authorisation and review reports submitted to the Commission requiring further consideration by committees	14	13
Number of meetings on analysis of alternatives and socio-economic analysis organised / attended	1	1

Objective 3: Commission supported in their decision-making tasks

Main Outputs	Execution	Status
Generic and case-specific support provided to Commission in the decision-making phase of the authorisation process.	ECHA participated in all REACH Committee meetings organised by the Commission in 2025 and provided the Commission services with regular support in the preparation, discussions and post-decision follow-up activities (e.g. legal entity updates- and extension of review date-related acts).	✓Yes

Indicators	Estimate	Actual
Number of comitology meetings on applications for authorisation and review reports where support is provided to Commission decision making	4	5

Restrictions[9]

Objective 1: Commission supported in the implementation of the Restrictions Roadmap

Main Outputs	Execution	Status
Based on request of the European Commission, Annex XV dossiers proposing restrictions and investigation reports prepared.	The requested Annex XV restriction proposal for certain chromium(VI) oxides, oxyacids and salts was prepared and submitted by ECHA in April 2025.	✓Yes
Screening reports for substances under Article 69(2) prepared.	Three screening reports were delivered, analysing whether there is a need to restrict the use in articles for substances subject to authorisation (Art. 69.2).	✓Yes
Support provided to Member States during their preparation of restriction dossiers notified in Registry of Intentions.	Support was provided to the French Member State preparing the Annex XV restriction proposal on Octocrilene, submitted to ECHA in July 2025. Support is also underway for two further Member State restriction proposals.	✓Yes

Indicators	Estimate	Actual
Number of restriction dossiers and investigation reports developed	1	1
Number of screening reports for substances under Article 69(2) prepared	3	3
Number of dossiers on which support is provided to Member States in their preparation of restriction dossiers	2	3

[9] Title VIII of Regulation (EC) No 1907/2006

Objective 2: Opinions of the Committees for Risk Assessment (RAC) and Socio-Economic Analysis (SEAC) are timely, robust and fit-for-purpose

Main Outputs	Execution	Status
Opinions on restrictions delivered to the Commission.	With opinion making ongoing on restriction dossiers (PFAS, chromates), no opinions on restriction were delivered to the Commission, as foreseen for 2025. Therefore, the indicator 'Percentage of opinions on restrictions submitted to the Commission adopted within the legal deadline' is not applicable for the reporting year.	✓Yes
Contribution provided to the development of methodologies related to socio-economic analysis, including the valuation of various health and environmental endpoints in collaboration with the OECD and in line with the Commission's Better Regulation guidelines.	Involvement was maintained in methodological development-related activities, with delivery of an OECD working paper on the valuation of hypothyroidism as part of the OECD SWACHE project, and support was provided on the development of a draft survey for the OECD SACRE project.	✓Yes

Indicators	Estimate	Actual
Number of RAC and SEAC opinions on restriction proposals delivered to the Commission	0	0
Percentage of opinions on restrictions submitted to the Commission adopted within legal deadline	100	N/A
Number of opinions on restrictions submitted to the Commission requiring further consideration by committees (Art 77 (3)(c)	0	0
Number of contributions provided to the development of methodologies related to socio-economic analysis and analysis of alternatives	2	2

Objective 3: Commission supported in their decision-making tasks

Main Outputs	Execution	Status
Case-specific support provided to Commission in the decision-making phase of the restriction process.	At the request of the Commission, support was provided in the decision-making phase related to four restriction proposals: PFAS in fire-fighting foams, lead in shooting and fishing, calcium cyanamide, creosote.	✓Yes
General and specific guidance to aid the implementation of Annex XVII restriction entries delivered to the	The guideline on the Formaldehyde restriction was submitted to the Commission in Jan 2025 and subsequently published on	✓Yes

Commission. General and specific technical support to aid the implementation of Annex XVII restriction entries delivered to the Commission.	the Agency's website. Support was provided to the Commission in developing guidance on the microplastics restriction and launched the new microplastics reporting system as part of the implementation support for this restriction entry.	✓Yes

Indicators	Estimate	Actual
Number of restriction opinions on which support is provided to Commission in decision making	4	4
Number of reports related to Annex XVII entries (e.g. guidelines) delivered to the Commission	1	1
Number of Annex XVII entries where implementation support is provided to the Commission	1	1

Classification and labelling[10]

Objective 1: Opinions of the Committee for Risk Assessment (RAC) are timely and fit-for purpose

Main Outputs	Execution	Status
CLH dossiers, including individual and groups of industrial chemicals, PPP and biocides from the outcome of identification and prioritisation processed in line with legal requirements.	CLH dossiers were processed in line with legal requirements. CLH process was launched for 95 CLH dossiers and 41 RAC opinions on proposals for harmonised classification and labelling were adopted. Eleven groups of industrial chemicals were processed in 2025.	✓Yes

Indicators	Estimate	Actual
Number of proposals for harmonised classification and labelling received and progressed	50	95
Number of RAC opinions on proposals for harmonised classification and labelling adopted	50	41

[10] Regulation (EC) 1272/2008

Objective 2: Member States, Commission services and duty holders supported to fulfil their legal obligations

Main Outputs	Execution	Status
Support provided to Member States during their preparation of CLH dossiers.	Support was provided to Member States via interface ARN-RMM projects throughout the year.	✓Yes
Guidance made available and updated as necessary.	One CLP guidance document was updated in Q4 as planned. Other guidance was progressed according to the plan for publication in 2026.	✓Yes
Decisions made on requests to use an alternative chemical name in line with legal requirements.	All decisions (Art 24 CLP) were sent in line with legal deadlines.	✓Yes
Scientific and technical support provided to the Commission in the context of the further development of the UN GHS.	Support was provided to the Commission in the context of the further development of UN GHS throughout the year in a number of areas. Activity in the context of the new CLP hazard classes and the GHS related discussions to apply these hazard classes globally was a key focus.	✓Yes
Scientific and technical support provided to the Commission in the implementation of the revisions of the CLP regulation and the UNEP-GHS project in African countries.	Regular support was provided to the Commission in the implementation of the revisions of the CLP regulation and the UNEP-GHS project in African countries throughout the year. ECHA attended the 8th Mombasa Annual International OSH Conference 2025, and the session on GHS in Kenya organised by the Kenyan authorities, in support of the Commission's GHS in Africa project.	✓Yes

Indicators	Estimate	Actual
Timeline for providing support to Member States during their preparation of CLH dossiers	Q1-Q4	Q1-Q4
Number of CLP guidance documents updated	1	1
Percentage of decisions issued (Art 24 CLP) and sent in line with the legal deadlines	100	100
Timeline for providing support to the Commission in the context of UN GHS	Q1-Q4	Q1-Q4
Timeline for providing support to the Commission in the context of UNEP-GHS project	Q1-Q4	Q1-Q4

Objective 3: Up-to-date information on the classifications for chemicals, both harmonised and non-harmonised, publicly available

Main Outputs	Execution	Status
New C&L inventory is operational and delivers reliable and up-to-date information about classification and labelling to its customers.	The new C&L inventory was launched in May 2025, providing up-to-date information on current and upcoming harmonised classifications as well as industry-submitted classifications. The new inventory was showcased in a variety of events over the year, and stakeholder feedback was collected to further develop it according to user needs.	✓Yes

Indicators	Estimate	Actual
Percentage of satisfaction of users of C&L inventory	Benchmark TBD	n/a
Number of workshops organised to inform stakeholders/users about new C&L Inventory	1-2	10

Objective 4: Structured, high quality and consistent information for the EU poison centre scheme available across Europe

Main Outputs	Execution	Status
Notification portal maintained.	While ensuring continuous PCN database operations throughout 2025, a 90% processing rate was achieved for notifications made available to Appointed Bodies and Poison Centres. The variance was attributed to technical submission bottlenecks and processing delays.	✓Yes
Support provided to companies and Member States.	Ongoing support was provided to industry, appointed bodies and poison centres in a timely and efficient manner. To provide a more comprehensive view of the impact, a transition from unit-level tracking to agency-wide reporting for PCN activity was made. While the initial estimate of 50 reflected only the outputs of a single specialized unit, the updated figure of 1 262 captures the total volume of PCN-related inquiries handled across the General Helpdesk and IT Support functions. This shift provides a more accurate representation of our collective workload and ensures future projections are based on this expanded,	✓Yes

	more precise data model.	

Indicators	Estimate	Actual
Number of Poison Centre notifications received	3-4 million	2 766 451
Percentage of notifications processed and made available to Appointed Bodies and Poison Centres	100	90
Number of Helpdesk replies provided to Appointed bodies and Poison centres	50	1 262

Data management

Objective 1: Regulatory processes performed by relevant actors based on robust data systems and processes

Main Outputs	Execution	Status
Data governance to support regulatory data consistency, coherence, transparency and reporting across regulations progressively matured. Data products identified through the data catalogue.	The data governance roll-out progressed and an independent study was carried out to assess its maturity. The suggestions for improvement provided will be used to further shape the actions to support regulatory data consistency, coherence, and transparency.	✓Yes
Internal reporting service reviewed and optimized, considering the new available technologies.	In 2025, a review of the Agency's internal reporting system was initiated. The review was completed by the end of 2025, and short- and medium-term follow-up actions were identified to secure reporting operations. The work will need to continue beyond this time frame to support the optimisation of the reporting service, considering newly available technologies.	✓Yes
New chemical identifiers data management system developed, and implementation commenced to increase efficiency and effectiveness across new and existing regulatory processes.	The first component of the chemical identifiers data management system was released in December 2025. It supports multiple solutions and enables effective and consistent management of chemical identifiers across newly onboarded regulatory processes at ECHA. Further development was temporarily paused pending additional analysis of existing processes, to ensure that future enhancements deliver tangible efficiency and consistency gains.	✓Yes

Case management capabilities further developed to increase efficiency of existing regulatory processes.	Relevant capabilities were released in December 2025, supporting the building, the configuration and orchestration of new submission modules and allowing effective process monitoring thereby increasing the user experience and efficiency of ECHA processes.	✓Yes
Interact Portal maintained with due consideration of process and users' requirements.	Two Interact Portal user group meetings were held in February and September and one annual Interact Portal users' event was organised in November 2025, where improvements were communicated and requirements collected. The Interact Portal user group, which was established in 2020 to engage with and gather feedback from Member State Competent Authorities (MSCAs), currently comprises 20 members from 12 MSCAs.	✓Yes
Data analysis services completed upon request from EU institutions or Member States.	Timely support was provided to requests for scientific data analysis from the Commission and Member States. This included, for example, assisting the Commission with a possible amendment of Directive 2004/37/EC on the protection of workers from the risks related to exposure to carcinogens, mutagens or reprotoxic substances at work. The number of requests was lower than anticipated, with 28 requests received compared to an estimate of 50. This decrease is consistent with the trend observed over the past two years.	✓Yes

Indicators	Estimate	Actual
Number of data products identified	50	40
Timeline for completion of internal reporting service review	Q4	Q4
Timeline for release of first component of the chemical identifiers data management system	Q2	Q2
Timeline for first release of new case management system applicable to the DWD process	Q3	Q3
Number of meetings held with stakeholders in relation to Interact	2	3
Number of data provision and analysis requests	50	28

Making data publicly available

Objective 1: Transparent and public access to data submitted under different regulations as well as progress on regulatory activities made available

Main Outputs	Execution	Status
ECHA's new public data availability system ECHA CHEM is operational and further developed and kept up-to-date.	In May 2025, the new C&L inventory was launched on ECHA CHEM, and in September, ECHA CHEM was expanded with information on regulatory activities and obligations under the REACH, CLP and POPs regulations and the Drinking water directive. Work continued to further expand the scope and features of the system.	✓Yes
OECD Global Portal to Information on Chemical Substances (eChemPortal) maintained.	A new version of the eChemPortal was released in 2025. Maintaining the eChemPortal covers two aspects: maintenance of the application itself and the updating of its data content. While the application maintenance was achieved through the planned release, the update of eChemPortal with ECHA data did not take place, as resources were prioritised for the expansion of ECHA CHEM with new major components and data sets. The update of eChemPortal with ECHA data was postponed to 2026.	✗No

Indicators	Estimate	Actual
Percentage of satisfaction of ECHA CHEM users	Benchmark TBD	n/a
Timeline for integration of information on classification and labelling in ECHA CHEM	Q2	Q2
Timeline for integration of information on regulatory status of substances in ECHA CHEM	Q2	Q3
Number of ECHA data updates on eChemPortal	1	0
Number of eChemPortal releases	1	1

Promotion of alternatives to animal testing

Objective 1: Industry generates hazard data using non-animal testing methods and new approaches

Main Outputs	Execution	Status
Development of the QSAR toolbox to integrate new information (for example, metabolites, biocides or data from pharmaceuticals) and models further developed.	Further developments of the QSAR Toolbox were released in August, directly supporting our work programme commitment to promote alternatives to animal testing and to enable REACH registrants to use grouping approaches. A promotional campaign is ongoing to raise awareness.	✓Yes
Data available for download (REACH studies results and pharmaceutical industry data contribution) expanded to be used for NAMs development and/or avoiding unnecessary animal testing.	Due to an insufficient number of pharmaceutical industry dossiers received, no update of datasets was published in 2025. The REACH study results were not updated due to ongoing IT developments related to the implementation of the new ECHA CHEM platform and challenges linked to change in technology. The status will be re-assessed in 2026.	✗No
Implementation of the OECD QSAR Assessment Framework (QAF) supported.	The QSAR QAF was promoted through a dedicated webinar organised in October, attracting approximately 500 participants online and over 1 100 views, and through presentations in several conferences and meetings.	✓Yes

Indicators	Estimate	Actual
Number of QSAR toolbox updates	1	1
Number of dataset updates to support NAMs development	2	0
Number of external events organised or attended to present the QAF	2	3

Objective 2: ECHA information and advice on alternatives to animal testing provided to policy makers and stakeholders

Main Outputs	Execution	Status
Support provided to the Commission roadmap on phasing out animal testing.	The Commission roadmap was supported in the Interservice group, and the Human Health, Environmental Working Groups and Interagency coordination. Contributions to several meetings and dialogues with NGOs and other stakeholders in relation to the roadmap were made. This required liaising	✓Yes

	consistently with stakeholders which increased significantly the number of meetings foreseen.	
Workshop on the roadmap organised jointly with the Commission.	The workshop to support the roadmap to phase out animal testing for chemical safety assessment was organised in June at ECHA premises and received very positive feedback.	✓Yes
Development of non-animal test methods in cooperation with ECHA's international partners progressed.	Several QSAR models were developed, for example, on Acute oral toxicity and Aquatic toxicity, as well as further modelling and conceptual developments on Toxicokinetics. In addition, non-vertebrate animal methods are being developed, such as the enhanced Fish Embryo Test (E-FET).	✓Yes
Collaboration with EFSA enhanced to support development of harmonised approaches for reducing the need for animal testing within regulatory context.	Quarterly meetings were held with EFSA on NAMs related topics.	✓Yes
OECD activities related to further development of alternatives and integration of regulatory relevant alternatives in test guidelines supported.	Activities such as omics sampling and guidance were carried out through WNT and WPHA OECD programmes. In addition, we contributed to two Integrated Approaches to Testing and Assessment (IATA) case studies. The number of related meetings and engagements was higher than anticipated in order to enable the timely finalisation of the omics projects, which were completed faster than initially foreseen.	✓Yes
International collaboration towards the identification and acceptance of alternatives in regulatory frameworks e.g., with US and Canada within the APCRA initiative (Accelerating the Pace of Chemical Risk Assessment) maintained.	Bilateral meetings with US EPA and Canada were held on specific topics, such as on NAMs for aquatic toxicity and on Omics-based grouping as well as the regular exchanges in the context of APCRA, which overall increased the number of meetings	✓Yes
ECHA supports Member States with the use of NAMs in pilot cases for CLH proposals as appropriate.	Three SVHC groups of substances and several POPs with Toxicokinetics profiling were supported. The requests for support from Member States were higher than estimated.	✓Yes

Indicators	Estimate	Actual
Number of meetings held with stakeholders on NAMs	4	21
Timeline for workshop on NAMs roadmap organised and delivered timely and effectively	Q2	Q2
Number of NAMs projects initiated	3	6
Number of bilateral meetings on NAMs organised	4	8
Number of OECD projects related to NAMs supported	2	6
Number of meetings related to NAMs with international partners organised and supported	2	9
Number of Member States NAMs cases supported	4	8

Biocides[11]

Objective 1: Active substance and Union authorisation opinions are timely and of high quality

Main Outputs	Execution	Status
Opinions on biocides active substances.	Number of opinions submitted on biocidal active substances exceeded the estimated number.	✓Yes
Opinions on Union authorisation of biocidal products.	Number of opinions submitted on Union authorisation of biocidal products exceeded the estimated number.	✓Yes
Opinions on same biocidal products, administrative changes, minor changes and major changes of the Union authorisations.	Number of opinions submitted on same biocidal products, administrative changes, minor changes and major changes of the Union authorisations exceeded the estimated number.	✓Yes
Opinions on classification of changes to national or Union authorisations of products.	Number of opinions submitted on classification of changes to national or Union authorisations of products was below the estimated number due to lesser number of requests received, with three requests received, compared to an estimate of nine.	✓Yes
Decisions on Technical equivalence applications.	Number of final decisions on technical equivalence applications concluded and sent to the applicant exceeded the estimated number.	✓Yes

[11] Regulation (EU) No 528/2012

Assessments of applications for inclusion in the list of active substance suppliers (Article 95 BPR list).	Number of final decisions submitted on Art 95 applications exceeded the estimated number.	✓Yes
Opinions and decisions are timely and fit-for-purpose.	Deadline was met in all cases, with one exception made to support an applicant's claim.	✓Yes
Cooperation with EFSA further advanced to implement the basis and mechanisms for alignment of evaluation of common substances (One Substance, One Assessment).	Collaboration took place on several substances and proposals for guidance alignment.	✓Yes
List of frequently used sentences in the SPCs updated and translated in all the EU official languages.	The list of frequently used sentences in SPCs was published in Q3.	✓Yes

Indicators	Estimate	Actual
Number of opinions on biocidal active substances [approval & renewal] finalised and submitted to the Commission	15	19
Number of opinions on Union authorisation [approval & renewal] of biocidal products finalised and submitted to the Commission	15	21
Number of opinions on Union authorisation related processes: same biocidal products, administrative, minor and major changes finalised and submitted to the Commission	45	56
Number of opinions on classification of changes finalised and submitted to the applicant	9	3
Number of final decisions on technical equivalence applications concluded and sent to the applicant	20	26
Number of requests of information and final decisions on Art 95 applications assessed and submitted to the applicant	25	30
Percentage of active substance and Union authorisation opinions and decisions submitted within legal deadlines	100	99.3
Number of requests from the Commission for a BPC opinion [pursuant to Article 75(1)(g)] to revise earlier adopted opinions	0-4	0
Number of meetings held with EFSA on alignment of evaluation of common substances	6	8
Number of updates of the list of frequently used sentences in the SPCs published	1	1

Objective 2: Member States and Commission supported to facilitate biocides processes and accelerate the Review Programme

Main Outputs	Execution	Status
Technical, procedural, regulatory and administrative support is provided to Member States in the evaluation and BPC opinion forming for active substance approval and on Union authorisation of biocidal products and to the Commission.	ECHA actively cooperated and supported the Member States and Commission throughout 2025, with the Member States survey showing a very high percentage of satisfaction (98%).	✓Yes
Fit-for-purpose opinions following requests by the Commission pursuant to Articles 38, 15(2) and 75(1)(g) of the BPR prepared.	Number of opinions on Article 15, Article 38 and Article 75(1)(g) submitted exceeded the estimated number.	✓Yes
Support to Member State competent authorities' (MSCAs) evaluations provided by early (informal) working group discussions and written consultations.	Support was provided with the number of activities exceeding the estimate.	✓Yes
Accordance check performed for all evaluations on AS and UA submitted by MSCAs.	All Member State evaluations were checked for accordance.	✓Yes
Organisation of information and training sessions for MSCAs to clarify and discuss emerging issues on the implementation of BPR.	Two information and training sessions were organised related to BPR, with positive feedback from MSCAs.	✓Yes
Organisation of a stakeholder workshop to share information and discuss challenges concerning various actors for the implementation of BPR.	Biocides Stakeholders' Workshop was organised in April.	✓Yes
Guidance documents developed according to agreed priorities and maintained aiming for alignment across regulations.	Guidance documents on evaluation for human health, on evaluation of resistance, and on recommendation for in situ generated active substances were finalised and published.	✓Yes
Technical input and support the Commission's evaluation of the BPR.	Following Commission's request, technical support was provided to the preparation of the Omnibus regulation. Main technical input to the BPR evaluation will be required in 2026.	✓Yes
Support and advice to Member States Competent Authorities to facilitate the resolution of disagreements in the mutual	Enhanced support, including experts' advice, was provided. The overall number of disagreement points put forward by Member States was lower than previously, with a	✓Yes

recognition process.	total of 35, compared to an estimate of 100, thus the number of closed points was lower than estimated.	

Indicators	Estimate	Actual
Percentage of satisfaction of authority actors in relation to biocides processes measured in annual survey	>85	98
Number of opinions on Article 15, Article 38 and Article 75(1)(g) finalised and submitted to the Commission	8	10
Number of early (informal) written consultations and early working group discussions to support the evaluation by Member States	100	141
Percentage of Member State evaluations checked for accordance	100	100
Number of information and training sessions for MSCAs related to BPR organised	2	2
Number of stakeholder workshops related to BPR organised	1	1
Number of guidance documents related to biocides processes finalised and published	3	3
Number of technical reports provided to support the Commission in BPR evaluation	1	0
Number of disagreement points related to mutual recognition closed	100	35

Objective 3: Biocides IT tools integrated with other ECHA regulatory IT systems

Main Outputs	Execution	Status
Progress with the development of Biocides IT tools in the frame and according to the plans of the general ECHA IT strategy.	R4BP 3 and IUCLID for biocides were maintained and improved in line with user feedback. IUCLID validation rules were defined and agreed, and effective engagement of stakeholders was maintained.	✓Yes

Indicators	Estimate	Actual
Number of updates of R4BP 3 released	2	6
Number of BPR IT user group meetings	1	1
First set of IUCLID validation rules for active substance applications agreed with Member State Competent Authorities	Q4	Q4

Contribution to EU Environmental policy

Objective 1: international trade of chemicals listed under the Rotterdam Convention and the PIC regulation facilitated and managed

Main Outputs	Execution	Status
Export notifications processed.	11 997 export notifications were received and processed.	✓Yes
Import notifications processed.	1 417 import notifications were processed. This number exceeded the estimate (800) due to the inclusion of 40 new substances in the PIC Regulation. This regulatory expansion increased the total volume of processed notifications beyond initial projections.	✓Yes
Explicit consent responses processed.	2 638 explicit consent responses were processed.	✓Yes
Support provided to EU MS DNAs and the Commission, including the management of explicit consent requests, to allow companies to export these chemicals in accordance with the EU's international commitments.	Support was provided to EU MS DNAs and the Commission, including the management of explicit consent requests, to allow companies to export these chemicals in accordance with the EU's international commitments. To ensure continued operational accuracy, the 2026 estimate has been adjusted to better align with actual performance metrics and realised demand.	✓Yes
Support provided to companies (via the helpdesk) and non-EU Authorities.	Support was provided as requested, in a timely and efficient manner.	✓Yes
Annual report on PIC exports and imports (Art. 10) published.	The annual report, published in December, highlights a downward trend in the trade of hazardous chemicals throughout 2024. Based on data reported by Member States, this decline is primarily driven by a significant reduction in the export and import volumes of benzene-containing substances.	✓Yes
Support provided to the Commission with the EU contribution to the Rotterdam Convention implementation, including the preparations of the draft final regulatory actions (FRAs).	Support was provided to the Commission with the EU contribution to the Rotterdam Convention Implementation, including the preparations of the FRAs.	✓Yes
Support provided to the Commission in the continuous improvement of the functioning and efficient implementation of the PIC	Ongoing collaboration with the Commission focused on optimising the implementation and efficiency of the PIC Regulation.	✓Yes

Regulation.

Indicators	Estimate	Actual
Number of export notifications processed	11 000	11 997
Percentage of export notifications validated	90	93
Number of import notifications processed	800	1 417
Number of explicit consent responses processed	2 000	2 638
Number of replies provided to DNAs and Commission	3 000	472
Number of Helpdesk replies related to PIC provided to companies and non-EU Authorities	250	440
Timeline for publication of annual report on PIC exports and imports (Art. 10)	Q4	Q4
Timeline for providing support to the Commission with the EU contribution to the Rotterdam Convention implementation, including the preparations of the draft final regulatory actions (FRAs)	Q1-Q4	Q3-Q4
Timeline for providing support to the Commission in the continuous improvement of the functioning and efficient implementation of the PIC Regulation	Q1-Q4	Q1-Q4

Objective 2: European Commission supported in the implementation of the Stockholm Convention and the POP Regulation

Main outputs	Execution	Status
Scientific dossiers drafted for a new EU proposal to list a potential POP substance under the Stockholm Convention on Persistent Organic Pollutants.	The scientific dossier for TBPH was updated after stakeholder consultation and sent to the Commission.	✓Yes
Processes on POPs reviewed to take account of new mandate on POPs in waste.	Work continued throughout 2025 to take account of ECHA's new mandate on POPs in waste.	✓Yes
Technical and scientific support provided as required to the Commission for the listing process.	Support was provided as agreed with the Commission. Continuous support was also provided to stakeholders. An increased number of helpdesk requests was observed, particularly related to the listing of new POPs under the Stockholm Convention and the EU POPs Regulation.	✓Yes

The reporting system for the implementation of the POP regulation maintained and the Union Overview report based on the Member States reports updated. These outputs will be delivered in line with resource constraints.	The Union Overview report was updated in May and December as planned.	✓Yes

Indicators	Estimate	Actual
Number of scientific dossiers drafted for the identification of new substances under Stockholm Convention	1	1
Timeline for implementing actions following review of POPs processes	Q1-Q4	Q1-Q4
Number of requests for advice and support related to the Stockholm Convention provided to various stakeholders	50	110

Objective 3: Substances of very high Concern In Products (SCIP) database maintained

Main outputs	Execution	Status
Notification portal and the public SCIP database maintained.	The SCIP portal's accessibility was maintained and a year-end publication rate of 89.7% achieved, despite lower notification volumes due to external market factors and system-related delays in the publication pipeline. The total number of notifications received was below the initial estimate of 8–12 million, primarily because the original forecast reflected total submissions rather than individual notifications. Actual volumes were also impacted by unpredictable market activity and industry reporting patterns. To account for this distinction and provide greater data clarity, the 2026 performance targets have been refined to 3–4 million notifications.	✓Yes
Support provided to EU suppliers of articles to submit the required information to ECHA.	Ongoing support was provided to EU suppliers of articles, assisting them in submitting the required information to ECHA in a timely and efficient manner.	✓Yes

Indicators	Estimate	Actual
Number of SCIP notifications received (incl. updates)	8-12	4 019 001

	million	
Percentage of SCIP notifications published within 3 months	>80	89.7
Number of Helpdesk replies provided to SCIP notifiers	1 000	979

Objective 4: Implementation of Drinking Water Directive

Main outputs	Execution	Status
Procedures for opinion forming by RAC and the RAC Working Group developed and implemented.	Templates, checklists and workflow for the development and adoption of a RAC opinion have been developed. Further refinements will be elaborated during 2026.	✓Yes
IT tools for the receipt, processing and dissemination of notifications available.	The tools for receipt, processing and dissemination of notifications are available and ready to start receiving notifications on 5 January 2026. A IUCLID manual for notifications of intention was published in May and updated in October.	✓Yes
Guidance documents to support applicants and RAC published.	Two main scientific guidance documents on the preparation of DWD applications and three shorter documents (on the scope of applications, notifications of intention and the submission of physical samples to JRC) were published in January. A detailed DWD infographic and a Practical Guide for notifications of intention were published in June.	✓Yes
Workshop with stakeholders to inform on the notification and the application procedures organised.	A Drinking Water Directive Stakeholders Workshop was held in October. The event was well-received and appreciated. Recordings, slides and written Q&As were published on-line.	✓Yes

Indicators	Estimate	Actual
Timeline for DWD procedures agreed by RAC	Q4	Q4
Number of IT tool releases related to DWD	1	1
Number of DWD guidance documents published	4	4
Number of workshops related to DWD held with stakeholders	1	1

Objective 5: An accessible and transparent evidence base to support the monitoring, measuring and reporting on chemicals

Main outputs	Execution	Status
Relevant indicators kept under review, monitored and reported as necessary.	Relevant indicators were reviewed during the year, but no action was needed, and no new indicators were developed.	✓Yes

Indicators	Estimate	Actual
Number of views of the chemicals indicators dashboard	500	3 485

Objective 6: implementation of the Batteries Regulation

Main outputs	Execution	Status
Part of the scoping study completed and provided to the Commission.	The first part of the scoping study, detailing the identification of substances of concern in batteries was delivered to the Commission in June 2025, as requested. This also included an investigation on the possibility to amend the current restrictions (under ELV Directive) for Mercury, Cadmium and Lead in batteries in Annex I of the Batteries Regulation.	✓Yes
Preparation for the implementation of the Batteries Regulation completed.	The multi-annual work plan for implementing the batteries regulation(implementation plan) was updated and approved.	✓Yes
Ongoing discussions held with relevant stakeholders.	Four meetings were organised with relevant stakeholders. The follow-up actions were fed into the ongoing scoping study work and the preparations for batteries restrictions work at ECHA.	✓Yes

Indicators	Estimate	Actual
Number of study reports provided to the Commission under the Batteries Regulation	1	1
Timeline for implementation plan for Batteries Regulation completed	Q4	Q3
Number of meetings related to the implementation of the Batteries Regulation held with stakeholders	4	4

Objective 7: preparation for the implementation of the Water Framework, Groundwater and Environmental Quality Standards (EQS) Directives (legislation pending)

Main outputs	Execution	Status
Technical and scientific support provided to the EU Institutions during the adoption of the legal acts.	Support was provided to the Commission as requested including related to EQS of sum of 25 PFAS.	✓Yes
Preparation for the implementation of the tasks completed.	The Trilogues were completed in Q4 2025 and adoption is still awaited. A draft implementation plan has been prepared and will be finalised once the legislation is adopted.	✗No

Indicators	Estimate	Actual
Timeline for direct inputs or response to queries related to Water Framework, Groundwater and EQS Directives from EU institutions during the legislative process	Q1-Q4	Q2
Timeline for implementation plan of Water Framework, Groundwater and EQS Directives agreed between ECHA and the Commission	Q3	n/a

Objective 8: Development of Best Available Techniques Reference (BREF) documents under the Industrial Emissions Directive supported

Main outputs	Execution	Status
Input to the review and update of Best Available Technique (BAT) reference documents is provided, in particular with substance-related information from the ECHA databases.	Input was provided for the MIN BREF (Mining sector) review and worked with Stakeholders to refine information on chemicals used in the sector. Input was also provided to the drafting of the new LAN BREF (Landfills sector), including identification and assessment of relevant substances during the initial phases. In addition, the Agency monitored and contributed as appropriate to other ongoing or recently concluded BREF processes, including on the STM BREF (Surface Treatment of Metals and Plastics), CER BREF (Ceramics), LVIC BREF (Large Volume Inorganic Chemicals), and Uniform Conditions for Operating Rules of Livestock (UCOL BREF).	✓Yes

Indicators	Estimate	Actual
Number of BAT reference documents supported	2	6

Objective 9: Implementation of the Packaging and Packaging Waste Regulation (adopted by the Council on 16 December 2024, entry into force pending publication in the Official Journal)

Main outputs	Execution	Status
Preparation of scoping study initiated.	2025 was the first year of implementation of the ECHA tasks under the packaging and packaging waste regulation. The scoping study was launched in July and is expected to be concluded in Q3 2026. One meeting was organised with relevant stakeholders in June, informing the packaging and packaging waste work at ECHA.	✓Yes

Indicators	Estimate	Actual
Timeline for initiation of preparation for packaging and packaging waste regulation	Q2	Q3

Objective 10: Preparation for the implementation of the proposals under One Substance, One Assessment package (Data regulation, POPs in waste, Medical devices, RoHS) (legislation pending)

Main outputs	Execution	Status
Technical and scientific support provided to the EU Institutions during the adoption of the legal acts.	Technical and scientific input was provided in support of the legislative process.	✓Yes
Preparation for the implementation of the new legal acts initiated.	ECHA organised itself to be ready to start preparing for the implementation of the legal acts once adopted.	✓Yes
Commission supported in setting up the Governance of the Common Data Platform.	Four meetings of the OSOA ISG subgroup on Common Data Platform were attended.	✓Yes

Indicators	Estimate	Actual
Number of direct inputs or response to queries from EU institutions during the OSOA legislative process	5	16
Timeline for implementation plans for OSOA developed	Q4	Q4
Number of OSOA Expert Group meetings supported	2	1
Number of meetings related to CDPC with relevant agencies supported	2	4

Other tasks, including tasks under grant, cooperation and service-level agreements

Objective 1: EUON database on nanomaterials on the EU market available and updated.

Main Outputs	Execution	Status
Specific data gaps in the public knowledge about nanomaterials via the commissioning of external studies addressed.	Two studies were completed, and two new ones were launched, in accordance with the EUON work plan.	✓Yes
EUON promoted via different channels to increase its outreach to a wide variety of audiences.	Social media campaigns were successfully used to advertise the observatory to different audiences.	✓Yes

Indicators	Estimate	Actual
Number of EUON studies commissioned as per Contribution agreement with Commission	2	2
Number of views of EUON pages	300 000	270 758
Number of visitors to EUON pages	150 000	124 887

Objective 2: EUCLEF database on EU chemicals legislation available and maintained

Main Outputs	Execution	Status
EUCLEF promoted wider to increase the utility of the service for the target audience, with a particular focus on SMEs.	Throughout the year, EUCLEF was consistently promoted using a diversified approach, with page views and visitors clearly exceeding estimates.	✓Yes

Advice provided via the EUCLEF helpdesk.	The outsourced EUCLEF helpdesk continued to provide timely support to customers, though usage was lower than estimated despite promotion activities.	✓Yes

Indicators	Estimate	Actual
Number of views of EUCLEF pages	350 000	1 738 901
Number of visitors to EUCLEF pages	130 000	385 004
Number of queries answered by EUCLEF helpdesk service	100	60

Objective 3: Opinions of the Risk Assessment Committee (RAC) on OELs delivered to the Commission.

Main Outputs	Execution	Status
SLA commitments completed.	The yearly agreement included one request for an OEL opinion and three separate reports, not undergoing opinion-making (i.e. no RAC formal involvement).	✓Yes
RAC opinions completed and delivered to the Commission.	Opinions on five OELs were completed and delivered to the Commission.	✓Yes

Indicators	Estimate	Actual
Number of OEL requests received under SLA	5	1
Number of RAC opinions on OELs completed and provided to the Commission	5	5

Objective 4: IPA grant implemented fully in support of EU candidate and pre-candidate countries on chemicals management.

Main Outputs	Execution	Status
Support actions as agreed in the IPA grant agreement for 2023-June 2026 implemented.	All the planned actions, workshops and bilateral meetings took place.	✓Yes
New IPA agreement prepared.	Preparation began later because the Commission's approach for the new agreement is still under development, including decisions on how to involve Ukraine and Moldova.	✓Yes

Indicators	Estimate	Actual
Timeline for IPA support actions delivered as per agreement with Commission	Q1-Q4	Q1, Q4
Timeline for signing the new IPA agreement	Q4	Q4

Objective 5: IUCLID platform cooperation on Plant Protection Products (PPP) between EFSA and ECHA continued.

Main Outputs	Execution	Status
Submitted dossiers processed and made available to EFSA.	Service was delivered as designed, with submitted dossiers processed and made available to EFSA.	✓Yes
First version of the Food contact Materials IUCLID format released.	In May, the IUCLID format for Food Contact Materials and Synergists and Safeners, as well as the update of EFSA-specific formats were released.	✓Yes
Plan for the development of IUCLID format to other relevant food regulated products prepared.	ECHA continued to support EFSA. Plans for the development of other IUCLID format are under development.	✓Yes

Indicators	Estimate	Actual
Percentage of dossiers submitted made available to EFSA	100	100
Timeline for release of first version of FCM format in IUCLID	Q2	Q2
Timeline for plan for the development of IUCLID supported	Q4	Q4

Objective 6: Input provided to research activities in support of current and future regulatory challenges

Main Outputs	Execution	Status
Input provided to PARC projects.	As co-leader of the 'Priority setting' task, ECHA's experts reviewed 79 projects (mainly linked to hazard, exposure and risk assessment methodologies). 'ECHA Science seminars' were launched, inviting PARC projects to present their achievements and regulatory relevance (e.g. NAMs for neurotoxicity endpoint, data generated on Bisphenols derivatives, etc.). Input was provided to the annual workshops organised by the different work packages (e.g. WP5, WP6). ECHA started following PARC exit strategy discussions.	✓Yes
Key Areas of Regulatory Challenge report updated and promoted.	The Key Areas of Regulatory Challenge was updated in June, following a joint webinar together with EEA and EFSA. A new chapter 'Promote circularity through safe materials' was developed referring to the Competitiveness Compass and the Clean Industrial Deal.	✓Yes

Indicators	Estimate	Actual
Timeline for providing input to PARC projects	Q1-Q4	Q1-Q4
Timeline for publishing Key Areas of Regulatory Challenge report	Q3	Q2

Objective 7: Implement the Regulation on Serious Cross-Border Threats to Health (SCBTH)

Main Outputs	Execution	Status
Procedure in place, aligned with the Agreements with DG SANTE and other agencies on deliverables and approach, tested and reviewed.	Major progress was made, but final approval of the procedure is now planned for Q1 2026.	✗No
(Contributions to) requested (rapid) risk assessments promptly delivered.	No requests were received but ECHA participated in simulation exercises.	✓Yes
Contributions in the area of chemical events to the assessments of the MS prevention, preparedness and response plans coordinated by ECDC made.	Contributions were made by participating in one audit so that we are better prepared for 2 audits in 2026 where chemicals were requested to be part of the audit scope.	✓Yes

Indicators	Estimate	Actual
Timeline for signing SCBTH Contribution Agreement	Q1	Q1
Percentage of requested (rapid) risk assessments delivered within expected timelines	100	n/a
Number of meetings and events related to SCBTH attended	2-4	6

Governance and Enablers

Objective 1: A level playing field for economic operators through increasingly harmonised enforcement across EU

Main Outputs	Execution	Status
Forum coordinated enforcement projects (four REFs, one BEF and three pilot projects) implemented.	All projects were initiated, run or finalised according to plan.	✓Yes
Subject matter of next EU-wide REACH enforcement project (REF) agreed and steps taken to implement actions.	The next EU-wide REACH enforcement project on safe use of chemicals in workplaces was agreed in the June meeting. The preparation, with interaction with occupational safety and health inspectors started.	✓Yes
Training provided for national trainers and inspectors developed and delivered.	Successful training sessions for Forum and for BPRS were held with physical and remote participation.	✓Yes
Advice on enforceability on all submitted proposals for restrictions delivered and published.	One request for advice on enforceability was received and responded to.	✓Yes
Further streamlined process to support NEAs in enforcement of ECHA dossier evaluation decisions, considering the findings of the JEAP.	This is part of the Forum agenda to continue the efficient collaboration. ECHA experts contributed to Forum discussions by sharing information on progress and priorities and by supporting exchanges on specific cases. In addition, cooperation was maintained through targeted contacts between ECHA and NEAs, ensuring effective coordination beyond the formal Forum setting.	✓Yes

Indicators	Estimate	Actual
Number of Forum enforcement projects ongoing	8	10
Timeline for initiating discussions on next EU-wide REACH	Q4	Q2

enforcement project (REF) and taking steps to implement actions		
Number of enforcement trainers trained by the Forum	500	705
Number of requests for advice on enforceability issued/ responded to	0	1
Timeline for identification of proposals for streamlined process to support NEAs	Q4	Q4

Objective 2: Board of Appeal[12] decisions are adopted without undue delay and are of high quality

Main Outputs	Execution	Status
Appeals brought against decisions of the Agency, according to procedural requirements, processed and decided.	Nine appeal cases were received and six were concluded.	✓Yes
Communication to parties and the public about appeal decisions completed.	The parties were informed of the outcome of appeal proceedings without delay. Decisions of the Board of Appeal and related news items were published in a timely manner.	✓Yes
Support provided to the Secretariat in defence of Board of Appeal decisions when challenged before the EU Courts.	Staff of the Registry and the Board of appeal supported the Secretariat in representing ECHA in two cases before the General Court.	✓Yes

Indicators	Estimate	Actual
Number of appeals submitted REACH	10	9
Number of appeals submitted BPR	2	0
Number of appeals concluded REACH	12	6
Number of appeals concluded BPR	2	0
Number of press items issued	14	5
Number of EU legal cases for which BoA is engaged	2	2

[12] Art. 90 of Regulation (EC) No 1907/2006 and Art. 77 of Regulation (EU) No 528/2012

Objective 3: ECHA's Governance aligns with strategy and adapts to the changing organisational and institutional landscape

Main Outputs	Execution	Status
Secretariat for the Management Board (MB) provided, with required plenary meetings and required (pre) meetings of subgroups.	The MB held four plenary meetings: two remote and two in-person, one of which was hosted by the Polish EU Presidency in Krakow. Ten subgroup meetings were conducted remotely.	✓Yes
Final and draft Programming Documents adopted by the MB.	ECHA's programming documents were prepared and published in line with legal requirements.	✓Yes
Quarterly and annual activity reports with key performance indicators (KPI) delivered to / adopted by the MB.	The Management Board adopted the general report and received quarterly reports containing KPI data from the Executive Director. ECHA's KPI dashboard was regularly reviewed by the Board, with relevant indicators tracked both quarterly and annually.	✓Yes
Quality, internal control, risk management frameworks implemented, including through operating the network of quality assurance officers, maintaining certifications, performing the annual internal control assessment and providing quarterly updates of the risk register.	The ISO 9001, ISO 14001 & EMAS certifications were maintained and the management systems were further developed, including the regular Management Review and its follow-up. Internal controls and risk assessments followed required policies.	✓Yes
The ECHA audit and evaluations plan implemented with regular reports to MB.	All audits and evaluations have been implemented and reported according to plan.	✓Yes
Review of the agency-wide reporting and monitoring data, to consolidate and streamline practices ahead of the 2026 five yearly report on ECHA’s operations (Art 117.2 REACH).	An assessment of available materials was carried out for ECHA's five-year report regarding the operation of REACH and CLP. A project was launched to ensure the report is completed by the legal deadline of 1 June 2026. Agency-wide reporting and monitoring data was also reviewed as part of the annual planning and reporting cycle.	✓Yes
Input on resource forecasting for the next multi-annual financing period prepared and communicated to the Commission and institutional partners.	Information on resource forecasting was supplied as required, delivering data to the Commission and a fact sheet to the European Parliament, coordinated by the EU Agencies Network.	✓Yes
Support the efforts of relevant actors in improving the workability of ECHA's scientific Committees.	The Secretariat made targeted efforts to improve the workability of the Committees, including through high-level bilateral meetings with Member States. Two MB	✓Yes

	discussions were held, resulting in agreements on managing the Committees workload and capacity. In 2025, membership reached 83% for RAC and 55% for SEAC.	
Agency wide policies, including data protection implemented; conflict of interest prevention policy and anti-fraud strategy reviewed.	In December, the MB revised the Policy for the Prevention and Management of potential Conflicts of Interest following a proposal by the Executive Director, which was informed by a steering discussion at the MB level in June. The revision of the anti-fraud policy was initiated, but not completed, and aligns with updated guidance from OLAF.	✓Yes
Engagements with Member States authorities conducted, including a meeting of heads of chemicals authorities, Executive Director country visits, and management of the Member State partner database.	The Executive Director visited authorities in six Member States, and senior managers and experts participated in a range of events, such as parliamentary hearings. The Agency also welcomed three delegations from Member States and ensured that the Member State contact database remained up to date.	✓Yes
Regular engagements and coordination activities with other EU agencies conducted, focusing on EFSA, EEA, EMA, ECDC and EU-OSHA, complemented by bilateral arrangements and contributions to the Network of EU Agencies.	The Memoranda of Understanding (MoU) between ECHA and EASA and EU-OSHA were updated, and a new MoU with the EEA has been initiated. ECHA offered to coordinate the EU Agencies Network in 2027. Bilateral meetings were held with various agencies and regular coordination meetings took place between the Executive Directors of the One Health Agencies.	✓Yes
Routine international engagements conducted, such as hosting courtesy or business visits from third countries and information provision on the requirements of EU chemicals legislation.	Ten meetings with third countries and international organisations were held, alongside regular OECD and IPA activities. The review of the agreement with Australia began but no actual agreement with third countries was revised. In December, the Management Board adopted a revised strategy for cooperation with third countries and international organisations.	✓Yes

Indicators	Estimate	Actual
Percentage of statutory documents adopted by MB within the required timeframe	100	100
Percentage of MB members trained on roles and responsibilities	100	100
Percentage of MB members attending plenary meetings	80	91.5

Timeline for MB adoption of programming document	Q4	Q4
Timeline for delivery of quarterly reports and annual activity report	Q1-Q4	Q1-Q4
Timeline: Discharge granted to the Executive Director for y-2 by the European Parliament	Q2	Q2
Timeline for ISO certification and EMAS registration of ECHA's Environmental Management System (EMS)	Q3-Q4	Q3-Q4
Number of reservations from the Court of Auditor observations on the accounts y-1	0	0
Number of major and critical deficiencies identified during internal and external audits and evaluations, including the internal control assessment	0	0
Timeline for review of data concluded and 5-yearly report started	Q4	Q3
Timeline for preparation and communication to the Commission and institutional partners of the input on resource forecasting for the next MFF	Q2-Q4	Q3-Q4
Percentage of Scientific Committee (RAC and SEAC) membership positions filled	67%	70.8
Number of breaches of trust or disciplinary procedure initiated for conflict-of-interest management or fraud prevention	0	0
Number of personal data breaches reported, as per legal requirements, to the European Data Protection Supervisor	5	2
Percentage of MB members and senior management declarations of interest as well as senior management meetings with stakeholders published	100	100
Number of high-level meetings conducted with Member States and European Union institutions	15	39
Number of Memoranda of Understandings and other bilateral arrangements reviewed or newly established with institutional and international partners	4	2
Number of courtesy or business visits organised with international organisations and third countries (excluding IPA and OECD)	6	10
Number of OECD meetings attended and supported	14	17

Objective 4: ECHA's communication is effective, transparent, targeted and timely

Main Outputs	Execution	Status
Communications Action Plan for	The Action Plan was implemented with clear, consistent and coherent	✓Yes

2025 implemented.	communications on ECHA’s activities and achievements.	
Communications Action Plan for 2026 developed.	The Plan was developed based on ECHA Strategy, SPD and WP 2026.	✓Yes
Growth in number of social media followers.	The number of followers across ECHA's social media channels - LinkedIn, X, Facebook, Bluesky, YouTube - increased by 20% from 132 257 on 31 December 2024 to 159 162 on 31 December 2025.	✓Yes
ECHA website acts as a communications channel.	Despite performance and stability issues throughout 2025 with the website, ECHA's public domains and subdomains continued to be the main source of information for duty holders and stakeholders with a total of 6.1 million visitors.	✓Yes
Cooperation on communications alignment and capacity building initiatives undertaken with sister Agencies and Member States authorities through the MS Competent Authorities Communicators Network.	This work was facilitated through three workstreams: • the Member State Communicators Network – which met twice in 2025 – and included representatives from the IPA countries, focused on sharing experience and knowledge, as well as strengthening competence and capacity; • ECHA's role in the One Health Agencies Heads of Comms informal network which met monthly to ensure coordinated actions and share relevant information and experience; and • ECHA's active participation in the broader EU Agencies Heads of Communications & Information Network. In addition to the identified workstreams, ECHA was also active in the: • One Health project with the other ENVI/SANTE agencies; • One Health Instagram account; • ICOP on Stakeholder Engagement (One Health Agencies).	✓Yes
Assessment of ECHA's external perception in view of new strategy and mandate.	ECHA's external perception project was launched in December 2025 and will be executed in the course of 2026 and delivered in Q4 2026 in line with contract delivery date.	✓Yes

Indicators	Estimate	Actual
Percentage of neutral and positive media coverage of ECHA	>85	96.1
Timeline for the development of the 2026 Communications Action Plan	Q4	Q4
Number of social media followers	140 000	159 162
Number of visitors to all ECHA public domains (*.echa.europa.eu) including also the subdomains: ECHACHEM, EUON, PCN, IUCLID, Chesar, etc.	4.2 million	6 100 607
Number of Communications Network Meetings held	2	2
Timeline for launch of the assessment of ECHA's external perception in view of new strategy and mandate	Q2	Q4

Objective 5: Open and transparent engagement with all stakeholders

Main Outputs	Execution	Status
Stakeholder perception benchmarks established.	A survey was launched and the results delivered in Q1. The benchmarks are now established with a follow up plan in place. Next survey will be undertaken in 2027.	✓ Yes
Preparations for ECHA Conference 2026 commenced.	The ECHA Conference will take place in 2027, to coincide with its 20th Anniversary, therefore this output has been moved to 2026.	✗ No
Accredited Stakeholders (ASOs) review completed and proposals implemented.	The timeline for the project was extended to complete the review by year end – in order to factor in the Committees Review outcomes, any new requirements under the Basic Regulation and similar reviews being conducted by sister agencies - and to present proposals in Q1 2026. Any changes to the regime will be implemented in 2026.	✗ No
NGO and Accredited Stakeholder Organisations dialogues held.	Biannual dialogues with non-governmental organisations (NGO) were held in April (remote) and October (in-person), including first-time sector participants, while two introductory sessions for Accredited Stakeholder Organisations were held.	✓ Yes
Engagements with stakeholders.	The number of interactions reflects those meetings held with non-institutional stakeholders by ECHA's Executive Director, its Directors and the Communications Unit, amounting to 79 meetings in 2025. The initially projected figure was an estimate for organisation-wide engagements. However,	✓ Yes

	as the roll-out of an organisation-wide customer relationship management (CRM) system, progressed more slowly than anticipated, it was not possible to systematically capture all interactions across ECHA. The full roll-out of the CRM in 2026 is expected to enable comprehensive tracking of stakeholder engagements across the Agency.	

Indicators	Estimate	Actual
Timeline for launch of Stakeholder perception benchmarking survey	Q2-Q3	Q1
Timeline for kick-off of preparations of 2026 ECHA Conference	Q2-Q3	n/a
Timeline for completion of ASO review and implementation of proposals	Q4	n/a
Number of meetings held with NGOs and ASOs	3	4
Number of engagements with stakeholders	200	79

Objective 6: Companies, and in particular SMEs, have the necessary advice to meet legal obligations

Main Outputs	Execution	Status
Questions are timely and effectively answered.	A total of 8 533 questions were answered.	✓Yes
Topics of broad interest/relevance discussed and agreed among all national helpdesks for harmonised advice.	Cooperation with national helpdesks and Commission continued. Workshops and video-conferences in combination with HelpEx were used to increase the harmonisation of answers.	✓Yes
Regular contacts with SME to understand and address better their specific needs established under the different legislations in ECHA's portfolio.	ECHA's SME action plan was launched, an SME hub was created on ECHA's website, and the first meeting of the SME focus group took place.	✓Yes

Indicators	Estimate	Actual
Number of helpdesk questions answered (across all our legal basis)	10 000	8 533
Percentage of queries answered within 15 working days	75	81.8

Number of meetings with national helpdesks	15	22
Number of SME dedicated dialogues held	1	4

Objective 7: Compliance with legal requirements related to finances, human resources, procurement, intellectual property and access to documents

Main Outputs	Execution	Status
ECHA's decisions comply with legal requirements, are consistent and proportionate.	No negative court judgments were received on ECHA's decisions. Only one decision was fully annulled by the Board of Appeal due to procedural reasons.	✓Yes
ECHA's contributions in legal proceedings follow ECHA's policies and are timely delivered.	Contributions in legal proceedings were submitted on time, and they corresponded to the agreed policies.	✓Yes
Legal review, advice and training provided to ensure sound decisions on access to documents.	The total number of access to document requests was 140 with the scope of many cases larger than before. For all cases, legal advice and review was provided. One general training and a few tailored trainings also took place.	✓Yes

Indicators	Estimate	Actual
Timeline for legal support	Q1-Q4	Q1-Q4
Number of new Court and Board of Appeal proceedings handled	26	25
Number of access to documents requests received and concluded	150	140

Objective 8: IT operations are efficient, secure and of high quality

Main Outputs	Execution	Status
The modernisation of end-of-life administrative tooling continued.	The implementation continued and will be completed in 2026 as initially planned.	✓Yes
New Cybersecurity and Information Security regulations implementation continued according to the given guidelines.	Cybersecurity Action Plan was approved and submitted as planned to CERT-EU by 8 January 2026 in compliance with the new Cybersecurity regulation.	✓Yes
User satisfaction surveys completed and indicating a high level of satisfaction.	The survey took place in December indicating a high level of satisfaction.	✓Yes

Key IT systems and solutions have high availability.	High availability figures were achieved for the year. A low of 99.91% for June was rectified to more standard 99.96%/99.97% for the remainder of the year.	✓Yes

Indicators	Estimate	Actual
Percentage of administrative tooling modernised	80	90
Number of high impact security incidents	<2	0
Number of data breaches	0	1
Percentage of internal IT user satisfaction	>85	89.1
Timeline for baseline data collection for User satisfaction score based on regular NPS data collection (Net Promoter Score)	Q4	n/a
Percentage of availability of key systems	>98	99.9

Objective 9: IT functions and business processes transformed, modernised and enhanced

Main Outputs	Execution	Status
Plans to transition to public cloud infrastructure and services completed.	Transition to public cloud was completed in June.	✓Yes
Year 2 of the long term (5 years) IT vision, plan and roadmap reviewed and updated.	Updated IT plan was delivered in December.	✓Yes
IT governance has incrementally enhanced.	Program Increment (PI) practices aligning IT, business and contractor teams continued and evolved. New portal governance was piloted through the year. A new evolved proposal for solution team structure has been put forward.	✓Yes
The target enterprise architecture adopted, and implementation ongoing to improve tooling for regulatory processes for internal and authority users. The target architecture includes in total 40 capabilities, which can be used to implement all regulatory processes. 15 of these capabilities will be needed to implement the first process (DWD solution) to new	The build of modular architecture continued. DWD NoI solution went into production utilising the new architecture and according to legal deadlines. In total, 13 re-usable capabilities, focusing on the DWD solution, were built during the year. This was two less than originally planned. During the design phase some of the capabilities where combined, hence the lower number.	✓Yes

architecture.		

Indicators	Estimate	Actual
Percentage of workloads migrated from data centre to public cloud	100	100
Timeline for completion of Public Cloud migration project	Q3	Q2
Timeline for review and update of long-term (5 years) IT vision, plan and roadmap	Q3	Q4
Number and share of teams working in regulatory context which are part of the program increment (PI) practise (An agile practise to synchronise, align and coordinate IT delivery across a portfolio of applications)	9/15 teams	15/16
Number of common capabilities implemented	15/40 capabilities	13/40

Objective 10: ECHA's budget is implemented in accordance with the objectives set in the Programming Document and the Financial Regulation.

Main Outputs	Execution	Status
Annual budget prepared and implemented in accordance with the objectives set in the Programming Document and the Financial Regulation.	The budget was implemented with commitment rate 99%, payment rate 89% (C1) and C8 payment rate 99%. Following the 2025 budget revision, the 2nd amending budget 2025 was adopted by the Management Board in its September meeting.	✓Yes
Annual accounts prepared and implemented for ECHA's MB and the relevant EU institutions, in accordance with the requirements of the Financial Regulation.	The European Court of Auditors provided a clean audit opinion on the Agency's annual accounts for 2024, with one observation to which the Agency replied accordingly, and made no observations on the first stage of its 2025 audit.	✓Yes
Procurement and contracting activities implemented in accordance with the objectives set in the Programming Document and the Financial Regulation, while meeting the requirements of legality and regularity.	The 2025 procurement plan was implemented in accordance with the objectives set.	✓Yes

Indicators	Estimate	Actual
Percentage of expenditure committed	>95%	99
Percentage of cancelled payment appropriations (including carry-forward)	<5%	0.9
Percentage of payments processed within legal deadlines	>99%	99.9
Number of audit observations on financial transaction management leading to a qualified opinion by the Court of Auditors (as per the latest available audit opinion)	0	0
Number of audit observations on procurement and contract management leading to a qualified opinion by the Court of Auditors (as per the latest available audit opinion)	0	0

Objective 11: Attract, develop and retain competent and committed staff to implement ECHA's mandate, purpose and vision.

Main Outputs	Execution	Status
ECHA's Wellbeing Action Plan 2025-2026 developed and implemented, in conjunction with ECHA's Joint Committee for Health and Wellbeing.	The new action plan covering 2025 and 2026 was developed with and endorsed by ECHA's joint Health and Wellbeing Committee. To support the implementation of ECHA Strategy 2024-2028 and People and Organisational Strategy 2024, the Wellbeing Action Plan 2025-2026 focuses on primary prevention through awareness raising, early support and strengthening of an inclusive working culture.	✓Yes
Regular communication with ECHA's Staff Committee to maintain a healthy working culture and positive relations and dialogue.	Meetings occurred with ECHA's Director of Resources on a monthly and with the Executive Director on a quarterly basis. The Chair of the Staff Committee and the Head of HR met weekly to exchange updates and identify matters of common interest that would merit swift action.	✓Yes
Actions related to ECHA's People and Organisational Strategy 2024-2028, and the organisational review completed.	An annual action plan for 2025 including deliverables and responsibilities was adopted to guide the work of the HR unit in this area. Some highlights in 2025 included a review of the ECHA induction training, the adoption of guidelines on performance indicators, the update of our competence database, the conclusion of new framework contract on medical services as well as the review of the ECHA rules on working time and hybrid working that include recommendations for the future implementation. During 2025, HR	✓Yes

	acquired the team leading role for the capacity review under the organisational review and ensured timely delivery of the report, which marked the final step of the exercise.	

Indicators	Estimate	Actual
Percentage of staff participating in annual medical check-ups organised by the Agency	80%	96
Number of meetings held between Staff Committee and senior management	4	4
Percentage turnover rate of Temporary Agents	<5%	1.5
Percentage turnover rate of Contract Agents	<10%	5.4
Percentage of staff participating in biannual staff satisfaction survey	80%	94.3
Percentage of Establishment Plan posts filled	95%	95.56

Objective 12: A safe, productive and healthy physical work environment for staff and guests

Main Outputs	Execution	Status
Planning for ECHA's future building requirements commenced.	Framework contract ECHA/2025/OP/0006 for Real estate consultancy services (property advice and technical assistance) was signed and a project manager was appointed.	✓Yes
ECHA's Environmental Work Programmes 2023-2025 and 2026-2028 implemented.	ECHA's 2023-2025 Environmental Work Programme (EWP) was completed, with all targets met, and prepared the actions for the 2026-2028 EWP which was adopted.	✓Yes

Indicators	Estimate	Actual
Number of planning meetings for ECHA's future building requirements	4	6
Annual CO2 emissions generated by ECHA (tonnes)	<1250	1030

Objective 13: Support development and implementation of new legal requirements.

Main Outputs	Execution	Status
Contribution provided to the Commission in relation to REACH	Technical and scientific assistance was delivered to support the Commission's policy	✓Yes

Revision, Basic Regulation, and other tasks (’s guidelines 2024-2029, including work on Green Deal REACH revision as well as reducing administrative burdens and simplifying implementation.).	formulation and legislative initiatives as requested. An internal coordination mechanism ensured that the Agency’s contributions were timely and consistent.	

Indicators	Estimate	Actual
Timeline for contribution related to REACH revision, basic Regulation, and other tasks provided to the Commission	Q1-Q4	Q1-Q4

Part II. Management

Management Board

The Management Board (MB) provides strategic direction and governance to ECHA to enable the Agency to deliver on its purpose and vision and meet the expectations of its stakeholders. In 2025, nine new members started their first term on the Board.

Further to its decision of December 2024 to transition the ECHA Board of Appeal (BoA) to an ad hoc structure, the MB decided in March 2025 that in the future, the BoA will be composed of three main members (who are not ECHA staff) with alternates, and that there would be a gradual transition to the ad hoc structure. The specialised subgroup of the MB oversaw implementation steps of the future structure throughout the year.

The MB continued discussing the challenges affecting RAC and SEAC's workability and endorsed, in December 2025, four measures put forward by the Secretariat for 2026-2027 to help both committees continue delivering transparent, independent, and high-quality scientific opinions.

In December 2025, the MB adopted ECHA's revised conflict of interest policy to refine procedures for staff and external collaborators, improve procurement-related CoI assessments, clarify applicable rules for different collaborators and update the policy to reflect recent organisational changes, case law and audit recommendations.

Regarding international relations, the MB revised ECHA's Strategy for cooperation with third countries and/or international organisations and confirmed, in this context, the Agency's approach to participation of third countries in ECHA's work.

Throughout 2025, the MB received updates about the legislative and policy developments with an impact on ECHA's mandate and resourcing, including the proposal for the ECHA Basic Regulation by the Commission. The Board also oversaw risk management activities, routinely reviewing the Agency Risk Register, IT and cyber-security reports, and, in June 2025, approved an update to the Agency Risk Management Policy to clarify governance protocols and adjust risk appetite levels.

The MB adopted all documents required by law in line with the applicable rules and regulations. In its capacity of Appointing Authority, the MB took the necessary decisions in all staff matters for the functions reporting directly to it (Executive Director, members of the Board of Appeal), including the annual performance appraisals.

Major developments

A comprehensive overview of the major internal and external developments affecting the Agency in 2025 is provided in the Executive Summary of the Annual Report, including legislative, organisational and scientific factors with a direct impact on the operations and strategic orientation of the European Chemicals Agency.

In 2025, ECHA operated in a rapidly evolving regulatory and organisational environment shaped by expanding mandates, rising scientific complexity and work on an organisational review. Several major internal and external developments had a direct impact on the Agency's work and strategic orientation during the year.

A major external development was the political momentum around the proposal for an ECHA

Basic Regulation, which progressed through the legislative process in 2025. This proposal aims to modernise ECHA's governance, strengthen the sustainability of the scientific committees, and formalise tasks previously carried out under ad-hoc arrangements. The year also saw concluding the negotiations under the One Substance, One Assessment (OSOA) package, giving ECHA a central role in shaping the future EU system for chemicals assessment, including through the establishment of a Common Data Platform that will be sourced by data from across EU and national authorities. These developments underscore the Agency's increasingly prominent position in the broader EU chemicals and environmental policy agenda.

Externally, the expanding scope and complexity of current scientific and regulatory tasks—such as the PFAS restriction process, new responsibilities under water legislation, and heightened scrutiny of methodological robustness—placed additional pressure on ECHA's capacities. The Agency noted partly timing mismatches between political decisions and the arrival of resources, requiring reinforced prioritisation and early preparatory measures to ensure continuity of high-quality outputs.

Internally, 2025 marked the near-completion of an organisational review, positioning the Agency for a more integrated, future-oriented operating model. This review strengthens governance structures, scientific coordination, data and IT integration, and cross-organisational collaboration—including in areas such as advanced science and artificial intelligence. The new organisational structure, to be implemented in early 2026, is designed to improve agility, capacity alignment, strategy implementation and the coherence of committee operations.

The Agency also continued modernising its internal systems and digital foundations. A modern IT and data landscape expanded significantly, with new modular systems, enhanced data governance and improved digital workflows, supporting both regulatory processes and transparency commitments. These developments contribute to a more anticipatory, data-driven regulatory model and improved stakeholder experience.

Strengthened cooperation with Member States, Commission services, EU agencies and third countries further shaped ECHA's role. Updated governance arrangements—such as a revised conflict-of-interest policy and renewed cooperation strategies with international partners—reflected the Agency's adaptation to a more complex institutional landscape.

For the work programme 2025, a number of activities were identified in the planning phase as negative priorities due to resource constraints and the need to focus on core regulatory tasks and preparations for new legislative responsibilities. As a result, certain activities progressed at a reduced pace. These included for instance slower than planned progress with some existing IT applications, as efforts focused on modernization and transformation of ECHA regulatory IT tools and expanding the ECHA CHEM platform. Further to meeting the screening and prioritisation milestones under the Integrated Regulatory Strategy in 2024, the work programme for 2025 also set new objectives and changed metrics to reflect our changed focus (see details under Identification and Prioritisation of (groups of) substances above.

Taken together, 2025 was not a "business-as-usual" year. Instead, it represented a period of substantial transition, preparation for upcoming legislative responsibilities, organisational renewal, and intensifying scientific demands. These developments collectively reinforce ECHA's long-term strategic positioning at the centre of EU chemicals regulation.

Budgetary and financial management

Financial management

ECHA effectively managed its financing in 2025, by closely monitoring the development of the uncertain fee income from industry and ensuring the sufficiency of the overall financing. By the

end of the year, the financial operations reached a commitment rate of 99% and payment rate of 89.1%, well exceeding the targets set. The European Court of Auditors gave a clean audit opinion on ECHA's annual accounts for 2024 and carried out the first part of its audit for the financial year 2025 without any observation.

Comprehensive details on ECHA’s budget information and financial management in 2025 can be found in Annex II.

Delegation and sub-delegation of the powers of budget implementation to agency’s Staff

ECHA maintains a system of operational and financial delegations as part of its Integrated Management System, which allows to effectively manage delegations and sub-delegations, considering the risk level of the particular process.

Human Resources (HR) management

In 2025, ECHA continued to implement the People and Organisational Strategy 2024-2028 with a focus on preparing for the onboarding of new tasks, reviewing existing processes and policies and improving our delivery in staff health and wellbeing. Our joint efforts in running selection procedures efficiently and investing in employer branding led to a high rate of filled establishment plan posts (95.56 %) with a low Temporary Agent turnover (1.5 %) rate. It is to be noted that the posts related to the Water Protection Directives (7 TAs and 4 CAs), 1 POP AD, 3 RoHS Directive ADs, 1 ELV AD and Data Regulation (7 AD and 8 CAs) were expected to come to ECHA during the year 2025 and were foreseen in the Authorised budget. However, those posts did not arrive in 2025 and are instead expected to arrive during 2026. This negatively affects the 'posts filled' ratio, which otherwise would have been 99.4% of establishment posts filled. In preparing for the new tasks entrusted to ECHA in the areas of risk management, water protection and data gathering and management, we updated ECHA’s competency database, aligned selection planning and facilitated the staffing and onboarding of two dedicated project teams for new tasks. We continued our dedicated efforts in health and wellbeing through the adoption of a new action plan and the conclusion of a framework contract on medical services which will increase support for staff and management in the strategic areas of prevention and early support. A strong rate of 96% of staff attending annual medical checks shows that health and wellbeing is well-established as a common responsibility of the individual staff member and the organisation. Finally, 2025 was also the year of ECHA’s biennial staff satisfaction survey with very good results for the Agency – 94% of our colleagues concluded that ECHA retains the award of being one of Finland’s most inspiring workplaces, with an overall satisfaction index of 78.1 (compared to the previous index of 77.4 in 2023).

See also Part I, activity Governance and Enablers, objective 11 for details on outputs and indicators.

Strategy for efficiency gains

ECHA’s strategy for efficiency gains in the SPD 2025-2027 included the following actions to ensure that it is maximising the use and efficiency of our available resources:

- Organisational review
- Capacity and competence of Committees
- IT and Business transformation
- Integrated Management System Strategy and Framework

The follow up below indicates the actions taken in 2025 in line with the efficiency strategy of the Agency.

- **Organisational review**

In 2025, ECHA completed its organisational review to respond to expanding mandates, increasing scientific complexity and strategic demands. The review resulted in a new organisational structure to be implemented in March 2026. The new organisational structure aims to help the Agency to deliver on existing, new and future tasks, and leverage synergies. This will ensure ECHA is well prepared to meet the challenges and opportunities of the future and ensure cross-organisational delivery, adaptability, accountability and simplicity of its operation.

- **Capacity and competence of Committees**

ECHA's Committees continued to deliver high-quality scientific opinions in 2025, handling increasingly complex and high-profile cases. However, workloads—particularly for RAC and SEAC—remain above sustainable levels, creating capacity risks. While improvements in governance and Member State nominations were made, long-term sustainability will depend on the adoption of the ECHA Basic Regulation[10], complemented in the short term by stronger prioritisation and closer coordination with Member States.

- **IT and Business transformation**

ECHA made progress in IT and business transformation in 2025, advancing its five-year IT roadmap, continuing the transition to public cloud infrastructure and expanding modular digital architecture. New systems, notably the Drinking Water Directive IT solution, demonstrated the benefits of a more integrated and scalable approach. Overall, IT and business transformation in 2025 laid the foundations for a more integrated, data driven and anticipatory regulatory model. While the scale of transformation contributed to temporary delays in some operational areas, it is expected to deliver long-term gains in efficiency, scientific quality, stakeholder experience and cross-Agency cooperation.

- **Integrated Management System Strategy and Framework**

ECHA's Integrated Management System Strategy and Framework is designed to enable the achievement of ECHA's strategic goals and priorities by ensuring a flexible and performance-based governance, adapted to the Agency's operational structure. It complies with ISO 9001:2015 (certified) and the Agency's own internal control requirements which are based on the Commission's Internal Control Framework. By implementing the IMS, ECHA's processes are intended to be effective and efficient by design through a critical consideration of the level of controls needed.

ECHA's Integrated Management System Strategy and Framework has demonstrated its effectiveness in achieving the Agency's strategic goals and priorities throughout 2025. The results of the annual benchmarking exercise (full results available in Annex IV) conducted in accordance with the Commission's requirements indicate efficiency gains in the Agency's administration. The 2025 results indicate a decrease of 0.4% in the percentage of administrative support and coordination staff, same level of operational staff and an increase of 0.4% in the percentage of neutral staff in comparison to 2024.

Assessment of audit and retrospective evaluation results during the reporting year

Retrospective evaluations

In 2025, ECHA performed the following retrospective evaluations following the criteria and methodology as stipulated in the Better Regulation Guidelines[13] :

- **Retrospective evaluation of ECHA's Integrated Regulatory strategy 2019-2023.** Upon request of the Management Board, this ex-post evaluation analysed the degree of effectiveness, relevance, efficiency, proportionality, coherence, added value and sustainability of the ECHA's IRS strategy. The lessons learnt will be used for implementing the current strategy 2024-2028.

  Main highlights from the evaluation are presented below:

- The Integrated Regulatory Strategy (IRS) 2019-2023 **has been in the centre of ECHA's strategy 2019-2023** and it was considered the tool to achieve Strategic priority 1 "maximise the availability of high-quality information to enable the safe manufacture and use of chemicals". In line with the strategy, ECHA's Management Board agreed on reallocating resources from other areas in view of achieving the IRS objectives. Most objectives of IRS have been achieved during the years 2019-2023, with some work ongoing under IRS 2024-2028.
- Even though not mandated by legislative requirements, IRS was adopted by ECHA as the implementation approach to demonstrate that **REACH is functioning effectively.** By focusing on screening and identifying substances of concern, the IRS laid the groundwork for future regulatory risk management measures. It also facilitated dialogue between Member States and ECHA, enabling both ECHA and authorities to focus on the substances that matter most for the protection of **human health and the environment.**
- The **main achievements** include the high number of **substances screened** and identified for further regulatory actions or for which no action is required. This was to a large extent achieved by **grouping** structurally similar substances. There has been a **positive trend** over the years in integrating the outcome from screening into the core operational processes.
- The **main obstacles** relate to resource constraints, regulatory complexity, data gaps and overlapping priorities. These challenges continue to be relevant for the IRS 2024-2028.
- The initial investment in the IRS required a lot of effort and human resources resulting in **low efficiency at the beginning**, however this is normal when starting a new initiative. While there is an indication of higher efficiency and productivity in some years, the overall picture for most of the years of the strategy was maintaining outputs and resources **at a relatively stable level,** with some signs of **de-prioritisation** of testing proposals for an increased focus on compliance checks.
- **The added value of the IRS** has been **high** for MB members, Commission and Member States. For industry, the added value and benefits differ depending on the action required by the industry and the potential financial resources associated with the action.
- **The added value of IRS** to protect human health and environment cannot yet be measured, since only the first step towards identification of substances that require regulatory measures has been taken.
- The IRS was **coherent with ECHA's strategy** (it was in the core of ECHA's strategy 2019-2023). It is considered **sustainable** while aligning its goals with the broader EU-initiative on "One substance, One assessment" and shifting the focus to **risk management measures** (rather than screening). Prioritisation, alignment and

[13] http://ec.europa.eu/smart-regulation/guidelines/tool_42_en.htm

harmonisation of the approach between Member States on the use and communication of the screening outcomes to industry will help in the implementation in 2024-2028.

Internal Audit Service (IAS)

The Internal Audit Service (IAS) of the Commission did not conduct audits in 2025 at ECHA. IAS has closed all pending actions from earlier audits. IAS prepared a 2026 – 2028 Strategic internal audit plan in 2025.

Internal Audit Capability (IAC)

The Internal Audit Capacity (IAC) conducted two assurance audits with the objective of assessing and providing reasonable assurance on the regularity and the quality of internal control systems applied as well as efficiency and effectiveness of the processes.

The audit "Prevention and management of potential conflicts of interest" resulted in one very important recommendation:

- In addition to self-declaration of CoI before meetings and when assigning rapporteurships, enhance pro-active use of the annual declarations of interest (DoI) information.

And three important recommendations:

- Increase efficiency of the collection of the annual declarations of interest of the ECHA body members and continue further development of the Declarations of interest IT-tool.
- Continue developing of the DoI process of ECHA staff members
- Provide similar instructions to ECHA staff as to members of ECHA bodies in procedure PRO-0067 Prevention and Management of potential Conflicts of Interest.

The audit "Access to documents and related Records management" resulted in five very important recommendations:

- To ensure consistency of the ATD process in the operational units, establish a strong process with more detailed instructions.
- To ensure efficient and effective access to documents -process, develop further document and record management.
- Improve instructions, awareness and enforcement of data protection related redactions.
- Enforce handling and protection of personal and business confidential data according to the policies and requirements.
- Improve data protection related documentation and enforce compliance with it on whole ATD process and lifecycle (by all participating parties and processing sites).

And five important recommendations:

- Ensure documentation of compliance with work instruction "Processing of applications for access to documents" (WIN-0011).
- Provide tools and services to be used on ATD process that are fit-for-purpose and fulfil security and data protection requirements.
- Continue further streamlining/ simplification of the ATD process
- To ensure consistency and efficiency in the ATD process, re-consider division of work between Legal Affairs Unit and operational units.
- Clarify ECHA's compliance with the requirement of the ATD regulation to provide public access to a register of documents.

The Agency follows up these recommendations with corresponding actions.

European Court of Auditors (ECA)

In their statement of assurance[14], the European Court of Auditors (ECA) concluded that the accounts of the Agency for the financial year 2024 present fairly, in all material respects the financial position of the Agency at 31 December 2024, the results of its operations, its cash flows, and the changes in net assets for the year then ended, in accordance with its Financial Regulation and with accounting rules adopted by the Commission's accounting officer. These are based on internationally accepted accounting standards for the public sector.

The revenue and payments underlying the accounts for the year were also legal in all material aspects.

The Court made one observation regarding the financial year 2024 to which ECHA replied accordingly[15]. There are no observations open from previous years.

Follow up of recommendations and action plans for audits and evaluations

For earlier audits, the Internal Audit Capability conducted two follow-up audits to verify the implementation of the action plans, concluding that 2 important actions are still being implemented.

The follow up of the retrospective evaluations from 2023 onwards and namely ECHA's financial model, ECHA's Committees[16] (RAC, SEAC and MSC), ECHA's Board of Appeal[17] and ECHA's HR strategy 2019-2023 show that most of the recommendations have been implemented.

The results of the retrospective evaluations of ECHA's financial model and ECHA's Committees have been taken into account in the Commission's announced proposal for an ECHA Basic Regulation[18]. The key changes proposed in the Basic Regulation are stipulated in Sections "Major developments" and "Strategy for efficiency gains".

Follow up of recommendations issued following investigations by the European Anti-Fraud Office (OLAF)

N/A

Follow up of observations from the Discharge authority

In accordance with Article 262 of the Financial Regulation and Article 107 of the Financial Framework Regulation and the Financial Regulation of the European Chemicals Agency (ECHA), the Executive Director of ECHA shall take all appropriate steps to act on the observations accompanying the European Parliament's discharge decision and on the comments accompanying the recommendation for discharge adopted by the Council, and at the request of the Discharge Authority, report on the measures taken in the light of those observations and

[14] Annual report on EU agencies for the 2024 financial year | European Court of Auditors
[15] ECHA_Form for final reply with explanation_EN.docx
[16] retrospective_evaluation_of_committees_report_en.pdf41
[17] ex_post_evaluation_board_appeal_en.pdf
[18] Proposal for a regulation on ECHA - Internal Market, Industry, Entrepreneurship and SMEs

comments.

ECHA's follow up report of the discharge[19] provides an overview of the relevant observations and recommendations from the European Parliament discharge[20] of 26 September 2025 for the financial year 2023. The report provides an overview of the measures ECHA has taken in light of the observations and requests for horizontal and specific actions made by the European Parliament in its Resolution of 7 May 2025 on discharge in respect of the implementation of the budget of ECHA for the financial year 2023. All other observations and recommendations of the Resolution have been analysed and ECHA has considered and will consider them in its work programming for the coming years. No comments accompanied the Council's Recommendation of 3 February 2025 on the discharge of ECHA for the financial year 2023.

See also Part I, activity Governance and Enablers, objective 10 for details on outputs and indicators

Environment management

Environmental and sustainability management

The 2025 objectives for environmental management at ECHA aimed at improving ECHA's environmental performance as laid down in ECHA's environmental policy (POL-0022) and to pave the way towards achieving climate neutrality by 2030. This was achieved through the implementation of ECHA's environmental work-programme and by actively promoting sustainability with our environmental management system (EMS).

ECHA's strategy is embedded in ECHA's EMS where we aim to be a trusted chemicals agency, we respond to emerging challenges and changes in our legal landscape, and we actively communicate and engage with our stakeholders**.** Improvements and innovation in ECHA's EMS are achieved through monitoring and verification, through process and legislative updates and by learning about developments with our stakeholders, particularly with other EU Institutions and Agencies.

Environmental objectives and indicators

Environmental Objectives 2023-25 (Benchmark year: 2019)	Target	Result in 2025	Achieved
Building CO_2 emissions	20%	85% decrease	✓ Yes
Travel (meeting participants) CO_2 emissions	50%	66 % decrease	✓ Yes
Travel (staff missions) CO_2 emissions	50%	60 % decrease	✓ Yes

2025 marked the final year of the 2022-2025 Environmental work programme (EWP) and through the continuous monitoring, reporting and verification of ECHA's EMS, the CO_2 reduction targets for building emissions and emissions related to staff and participants attending ECHA's Committees were met.

[19] ECHA discharge follow up 2023: DL internal 22 August 2025
[20] https://oeil.secure.europarl.europa.eu/oeil/en/document-summary?id=1782930

The achievement of the travel related targets should be seen in the context of the introduction of measuring the impact of Radiative Forcing Index (RFI) for air travel due the coming into force of the EU's monitoring and a reporting legislation[21] for non-CO_2 effects of aviation on intra-EU flights in January 2025. ECHA will follow best practice and include RFI emissions to provide a more comprehensive overview of the environmental impact of its travel emissions. This will lead to a near twofold increase of ECHA's air related CO_2 emissions. ECHA's 2019 baseline data for travel-related CO_2e emissions will be corrected to reflect this and is an action in the 2026-2028 environmental work programme, however, ECHA's overall emissions KPI will be maintained.

Furthermore, in 2025 ECHA introduced a training module for newcomers who are now required to follow the EMAS e-learning course which aims to maintain a high level of staff awareness.

Monitoring, Audits and Certification

ECHA's EMS it is subject to regular audits to ensure that it performs according to our objectives. In addition to implementing the follow-up action plan in 2025 of the assurance audit of ECHA Environmental management system conducted by ECHA's IAC, four other audits took place in 2025: the ISO 14001 certification Audit, the EMAS Verification audit and two internal audits. The audits did not identify any non-conformities or critical, very important or important recommendations, and ECHA's ISO certificate and EMAS registration were both renewed.

Achieving climate neutrality

To achieve carbon neutrality by 2030, ECHA will need to continue reducing its carbon footprint and then compensate the unavoidable residual greenhouse gases (GHG) emissions. Work on both these topics continued in 2025 in identifying the major contributors to ECHA's carbon footprint by 2030 and to prepare for the legislative provisions of the forthcoming CRCF Regulation. In the former case, it has been calculated that by 2030, over 90% of ECHA's carbon emissions will originate from aviation transport which is needed by staff and committee participants to travel in order to achieve our mandate. In the latter case, ECHA worked with the Finnish Centre for Economic Development, Transport and Environment to establish the market for carbon removals and a procurement channel with HANSEL, the central purchasing body for central and local governments in Finland.

These topics are reflected in the 2026-2028 EWP, which was prepared and adopted in 2025 by ECHA's management team and which will steer our course in the run up to our 2030 climate-neutrality objective.

Communicating with stakeholders

Finally, to promote and implement ECHA's environmental objectives, over 30 training and internal communications activities were undertaken during 2025 to promote climate awareness actions such as Earth Day, EU Green week and the Baltic Sea Day.

To ensure good cooperation, communication and knowledge sharing throughout the year with our EU partners, ECHA participated in numerous events virtually. The events were organised by external stakeholders such as the Groupe Interinstitutionnel de Management Environmental (GIME) and the EUAN Greening Network (GN).

[21] New monitoring rules agreed for the EU ETS, including non-CO_2 emissions from the aviation sector - European Commission - EUR-Lex - 02018R2066-20250527 - EN - EUR-Lex

EU Institutional information sessions and meetings

- Aviation sustainability seminar, organised by ECHA, with the participation of EC DG MOVE, EASA & FINNAIR - ECHA organised a seminar on sustainable aviation to highlight one of the major challenges facing ECHA to meet its 2030 Carbon neutrality commitment. Participants from the European Commission, EASA and the airline industry presented how the EU is addressing these challenges and what solutions will be available to enable sustainable aviation in the future.

EUAN Greening Network meetings:

- Sustainable mobility, May
- New missions guide, June
- Energy, July
- New missions guide, October
- Environmental internal audit, December

GIME:

- ECHA participated to GIME meetings (topics included: Greener travel, carbon removals, interinstitutional EMAS Days 2026, etc.).

Assessment by management

Based on the information in the Section II, no significant weaknesses or gaps that may threaten the achievement of ECHA's objectives were identified. An overall conclusion taking into account the findings from the internal control assessment is available in **Part III.**

Part III. Assessment of the effectiveness of the internal control systems

Effectiveness of internal control system

Compliance and performance of ECHA under the Integrated Management System Strategy and Framework

The purpose of the annual internal controls assessment is to give reasonable assurance that ECHA's management system is functioning, continuously improved, and that the objectives set out in Article 30 of the ECHA Financial regulation are met, namely: (I) effectiveness, efficiency and economy of operations; (ii) reliability of reporting; (iii) safeguarding of assets and information; (iv) prevention, detection, correction and follow-up of fraud and irregularities; and (v) adequate management of risks relating to the legality and regularity of the underlying transactions.

The reference for the assessment is ECHA's Integrated Management System Strategy and Framework, (POL-0001) which supplements the financial regulation and aligns with the principles and guidelines set out by the European Commission (in the areas of internal control and programming) and with the ISO 9001:2015 and ISO 14001:2015 standards.

The assessment is based on a wide range of sources, such as internal and external audits, retrospective evaluations, risks, non-conformities, complaints, appeals, financial, operational, IT, environmental and HR reports, complemented with insights from self-assessments of managers, staff and stakeholders' surveys. Internal control surveys were conducted to capture the self-assessment of Directors and Heads of Units with regard to the functioning of the ECHA's management system. Stakeholders' input was captured in the stakeholders survey and various retrospective evaluations and audits. Staff perception was captured in the staff survey (latest from 2025) and other internal reports and events. All sources mentioned above were analysed and triangulated to derive conclusions.

Following the recommendations from the IAS audit on 'Budget preparation, monitoring and reporting' in 2023, ECHA analysed the whole exceptions register. The detailed conclusions from the analysis of the exceptions register as well as the trend between 2024 and 2025 are available in the internal controls assessment for the year 2025.

For 2025, the assessment confirms that the Integrated Management System (IMS) is effective and functioning as intended. All directors and most middle managers agree that management commits to the core principles. Also, most of the detailed components are fully present and functioning (8 out of 12), while areas identified for improvement are not considered major, or critical, deficiencies of the whole IMS or about the objectives of Article 30 of the ECHA Financial Regulation. Details of the assessment are available in the next section. Improvement work is either ongoing or planned for 2026.

In terms of costing the controls, the Agency follows the definition in the General Financial Regulation[22] of the EU, according to which 'control' means 'any measure taken to provide reasonable assurance regarding the effectiveness, efficiency and economy of operations, the reliability of reporting, the safeguarding of assets and information, the prevention and detection

[22] Financial Regulation applicable to the general budget of the Union: https://op.europa.eu/en/publication-detail/-/publication/e9488da5-d66f-11e8-9424-01aa75ed71a1

and correction of fraud and irregularities and their follow-up, and the adequate management of the risks relating to the legality and regularity of the underlying transactions, taking into account the multiannual character of programmes as well as the nature of the payments concerned'.

Controls may involve various checks, as well as the implementation of any policies and procedures to achieve the objectives. Based on an approximation of the resources deployed in the units responsible for governance, human resources and financial management, as well as the average salary costs, the cost of controls as a percentage of the total budget are estimated to be around 2.9 % which is at a similar level as 2024, when the percentage was 2.8% and lower than 2023 when it was at the level of 3.4%.

The summary from the internal controls assessment as per the principles and characteristics of each component is covered in the next section below.

Risk management

Risk management remained a core component of ECHA's Integrated Management System throughout 2025. The risks with the potential to hinder the achievement of the objectives set out in the Programming Document were monitored continuously, with more detailed assessments conducted every four months. Regular updates were provided to the Management Board to ensure transparency and informed oversight.

In 2025, ECHA further advanced the implementation of its internal risk management framework across processes, Units and projects. This included the development of a cost–risk–benefit guidance to support more balanced and evidence-based decision-making. Awareness of the new guidance was actively promoted among middle management and designated staff, including Quality Assurance Officers, to strengthen risk culture and ensure consistent application throughout the organisation

Transparency, accountability and integrity

Throughout 2025, the Agency lived up to its values of transparency and integrity, ensuring continued public and stakeholder trust in the impartiality and objectivity of ECHA's work.

The decision-making processes of the Agency are designed to be clear, open and to ensure a balanced outcome based on a reasoned scientific approach. Information on the intentions of ECHA and the Member States – for example, to look into substances or create dossiers – is available online, so companies have access to the data they need to make informed business decisions.

Stakeholders may participate in scientific meetings as observers, except where confidential business information requires sessions to be closed. This gives them a chance to witness the debate and decision-making process and, where appropriate, express their views. Where consultations take place, the comments received are discussed and addressed. The reflections, minority opinions and conclusions of ECHA's scientific committees are recorded in opinions and minutes, and these are published online.

ECHA maintains the world's largest regulatory database on chemicals. The database provides transparent information on the chemicals used in Europe today. ECHA CHEM, which was launched in 2024, is ECHA's new public chemicals database. Initially, it included data that companies have submitted in their REACH registrations. During 2025, ECHA added further datasets such as the redesigned Classification and Labelling Inventory and incorporated overviews of different regulatory activities by authorities and the resulting outcomes.

Prevention of conflicts of interest

Based on a thorough risk assessment of its activities, the Agency has identified the processes and sub-processes that require conflicts of interest to be managed. Conflict of interest checks are performed for more than 30 processes, sub-processes or process steps, including the main operational processes of the Agency.

In all these processes, a review of the annual declarations of interest is performed by the process owner each time a task is assigned to a staff member, while for some sensitive processes this is complemented with a case-specific declaration of no interest by the staff member.

If there is a potential conflict, the case is assigned to a different staff member. The approach is documented in detailed work instructions and guidance is available for those managing the interests to help them deal with individual cases. As a result, no cases of actual conflicts of interest among ECHA staff, affecting the output of the Agency were identified in 2025.

For the ECHA bodies, all members are assessed against the generic exclusion criteria agreed by the Management Board, at the time of their appointment. Once they take up their function, their annual declarations of interest are reviewed by the respective Chair and published on ECHA's website.

Before each meeting of an ECHA body, specific declarations for items on the agenda are collected and documented in publicly available minutes together with the mitigating measures imposed. As most of the members of ECHA's bodies are Member State public officials, the majority of the conflicts of interest declared by the members concerned involvement in preparing dossiers submitted by their Member State competent authority. In all such cases, the members concerned were not allowed to participate in the voting on such dossiers.

Post-employment

Members of staff must notify new occupational activities for the first two years after leaving the service of the Agency. ECHA can forbid the new activity or impose conditions.

In 2025, twenty-five (25) staff members left ECHA: nine (9) of them went to work for another EU institution, body or Agency. Two (2) staff member moved to a national public administration or international organisation. Four (4) staff members moved to the private sector or started self-employment and, in two (2) of these cases, the Agency deemed it necessary to impose specific conditions, in accordance with the rules of the staff regulations, due to the nature of the occupational activity or the role of the individual within their new occupation.

In the remaining ten (10) cases, ECHA has not (yet) been informed about a new occupational activity, as the departure was due to retirement, termination of contract or death of a staff member. None of these cases concerned a member of senior management.

An overview of the post-employment decisions of all former senior managers is published on ECHA's website, including their names, date of departure, positions, their foreseen new occupational activities, and the outcomes of ECHA's assessments[1].

No breaches of trust or disciplinary procedure were initiated for conflict-of-interest management.

[1] https://echa.europa.eu/documents/10162/13559/post-employment_senior_managers_en.pdf/8567fc1f-1631-05fe-eceb-8817a0e110d1

Conflict of Interest Advisory Committee

The Conflicts of Interest Advisory Committee (CoIAC) is an advisory body in the context of ECHA's Policy on Prevention and Management of Potential Conflicts of Interest (Policy). The Committee is available to the Management Board, the Committees, the Forum and the Executive Director for advice on matters related to potential conflicts of interest of ECHA staff or members of the Agency's bodies.

The Committee comprises three members: Agnès Lefranc, appointed by the Management Board from among its members, Madeleine Healy, a Senior Compliance Expert from the Single Resolution Board, appointed as an external expert, and Minna Heikkilä, Head of ECHA's Legal Affairs Unit as Chairperson. The Management Board member was newly appointed in 2025. The Committee also comprises three alternate external experts.

In January 2025 the CoIAC convened to discuss possible changes to the Terms of Reference of the CoIAC, in particular to reflect on the Committee's composition and to ensure the Committee's functioning in view of the appointment of alternate external experts under the revised Policy.

In the course of 2025, the CoIAC delivered two opinions. In its annual meeting, the CoIAC discussed a request for advice from the Executive Director related to preventing potential conflict of interests in the context of tenders for expert services. In November, the CoIAC further advised on the application of the Policy in the context of appointments to ECHA's bodies.

In 2025, following CoIAC Opinion 1 of 2024 and an internal audit, the conflict of interest prevention and management policy was strengthened to better reflect the different conflict of interest rules applicable to different categories of external collaborators working for ECHA. Procurement rules were also strengthened to avoid conflict of interests.

Ex-post controls

In line with the Procedure on Prevention and Management of potential Conflicts of Interest, ECHA may undertake ex-post controls to guarantee the effectiveness of the procedure.

A sample check on 32 annual declarations (DoI) submitted by the Drinking Water Directive Working Group of the Risk Assessment Committee revealed that all declarations of members in place in 2025 were duly published on the ECHA website, together with their CVs, with a degree of accuracy and completeness sufficient to allow for effective conflict of interest prevention and management. However, it was noticed that, while it is fine to have only one DOI for members of both the RAC and the DWD WG, not all members being part of these two bodies explicitly state it in their declaration, with a tendency to indicate RAC membership rather than both RAC and DWD WG. This however did not undermine the process of verifying conflicts of interest, as an up-to-date DoI was available in each of the bodies' pages, but it did not give stakeholders a comprehensive nor consistent view on dual membership from reading the DOIs.

Fraud prevention

By design, the Agency's internal control systems contain fraud prevention, with an emphasis on critical areas such as financial transactions, procurement and selections.

ECHA's Code of Good Administrative Behaviour[23] is well communicated to all staff members. Management Board decision 30/2009 of 23 April 2009 stipulates the terms and conditions for internal investigations in relation to the prevention of fraud, corruption, and any illegal activity detrimental to the Communities' interests.

Guidelines for whistleblowers were first adopted in 2015 and updated in September 2018. Through these guidelines, ECHA ensures that its employees can always highlight any action which goes against the public interest.

The ECHA Anti-Fraud Strategy[24] was revised by the ECHA Management Board in December 2022 and includes a focus on maintaining and further developing the anti-fraud culture in the Agency and regularly reviewing key policies and procedures. In autumn 2025 a mandatory all-staff in person learning was organised, with a focus on conflict of interest and fraud prevention and Human Resources ethics processes according to the EU Staff Regulations, while the Management Board members also received an annual refresher on ethics. The outsourcing policy was approved on 26 September 2025, and the conflict of interest rules were revised and now include stricter provisions on procurement.

In preparation to the update of the **anti-fraud strategy** foreseen for 2026, ECHA included questions on the potential fraud and CoI risks in the annual management survey of 2025. The results of the survey show that ECHA has a **strong internal controls system** and good controls to potentially identify CoI and fraud risks.

See also Part I, activity Governance and Enablers objective 3 for details on outputs and indicators.

Data protection

The Data Protection Officer is an independent function within the Agency, who advises the Agency and staff on compliance with privacy laws and regulations. He keeps the required records of processing operations centrally and acts as the liaison with the European Data Protection Supervisor.

In 2025, the focus areas of support concerned the regular review of data protection aspects of procured IT licences and software and the roll-out of first AI pilot projects and privacy risks involved. Actions have also been taken in the context of twelve personal data breaches that occurred in ECHA and involving ECHA staff and/or stakeholders. Two of those personal data breaches were communicated to the European Data Protection Supervisor (EDPS), as legally required due to the risks to the rights and freedoms of the persons concerned. The first incident concerned personal data of study authors in a CLH report being published unredacted on the website, while the second incident concerned the non-compliance of data classification and access controls in internal IT systems (no external disclosure). As required, these cases were recorded and reported, and appropriate mitigating measures were agreed with process owners to prevent potential occurrence in the future.

See also Part I, activity Governance and Enablers objective 3 for details on outputs and indicators.

[23] https://echa.europa.eu/documents/10162/13559/code_of_good_administrative_behaviour_en.pdf/a4aa94f7-f631-43d6-8c28-77a10a0d0720
[24] https://echa.europa.eu/documents/10162/10709201/final_mb_47_2022_annex1_anti-fraud-strategy_2023-2026_en.pdf/c42eb6f4-1d61-5be9-83a4-3f4af5ee6b4e

Security and business continuity

Regarding cybersecurity, following the adoption of the new EU regulation in December 2023 laying out several legal obligations, implementation of the legal obligations commenced in 2024 and continued through 2025.

The regulation stipulated a number of key milestones in 2025 as follows:

- 8 April 2025;
  - Conduct an initial cybersecurity review
  - Establish an initial cybersecurity plan
  - Establish an initial cybersecurity risk management, governance and control framework
- 8 July 2025
  - Conduct a cybersecurity risk assessment

ECHA has met all of the 2025 implementation milestones.
The final milestone in the cybersecurity regulation implementation is 8 January 2026, which is approval of the cybersecurity plan.
The cybersecurity plan has been agreed and signed-off and will be submitted to CERT-EU by the milestone date.

Cybersecurity awareness campaigns continued in 2025 with several Cybersecurity Awareness trainings provided as follows: "Cybersecurity the next steps", "Data Defence", "European Cybersecurity Month course".

In 2025, ECHA introduced an additional indicator, 'Number of data breaches' with the following definition: "Number of events of unauthorized exposure or disclosure of sensitive information with very high impact for ECHA (e.g. industry confidential data, sensitive personal data of ECHA staff, etc.)".

During 2025 ECHA experienced one data breach incident that met the definition. The incident, identified in Q4 pertained to the potential data breach of personal data, due to lack of privacy by design in the concerned IT Tools and practices.

With regard to the indicator: 'Number of high impact security incidents', with a yearly estimate of "2."- ECHA reports "0" (zero) occurrences of such incidents in 2025.

During the course of 2025 ECHA experienced a limited number of security incidents, mostly in Q4. In general, these were categorised as low impact incidents pertaining to ECHA CHEM and a privacy by design issue with a number of our internal systems.

Conclusions of the assessment of the internal control systems

Component	Conclusion
Governance	
1.1 Purpose and vision	Stakeholders and staff have an overall good understanding of ECHA's role, aims and activities. Internally, even if the new strategy is well communicated, more efforts may be needed so that staff could link their work to it.
1.2 Values and behaviours	The principle is present and functioning. ECHA is making additional efforts in increasing awareness raising on sensitive topics. Values are well lived up to, in particular transparency and integrity, followed by collaboration. Despite the efforts to promote "innovation", that remains the most difficult value to exemplify and live up to.
1.3 Management responsibility	The Integrated Management System is well functioning, and its assessment follows good practices. Sustainability commitment has increased. The quality assurance officers' satisfaction with the organisation of the Integrated Management system has improved as well. Areas for attention include the staff empowerment, minimising bureaucracy and ensuring smooth flow of communication at all ECHA levels, as well as further involvement of middle management in decision making.
1.4 People (Human Resources)	ECHA has competent and highly qualified staff and is committed to investing in people and organisational excellence. Overall, staff has a good work-life balance and is committed to their work. Areas of attention include the consistent and more illustrative competence gaps identification and mapping and the staff performance management in an uniform way.
1.5 Stakeholders and partners	ECHA has further implemented its stakeholders' engagement approach in 2025. Whilst, stakeholders are overall satisfied with ECHA, the survey results are more nuanced for important stakeholder segments. There is for example a need for further support to SMEs, engagement in a two-way dialogue, higher transparency and process clarity, in particular with regards to the Committees processes. Opportunities for improvement are found in the right balance of ECHA's engagement with targeted stakeholders, both with regards to existing and the new tasks.
Strategy, planning and risk management	
2.1 Goals planning and resource allocation	ECHA's management is clearly defining the strategic goals of ECHA and identifying the risks related to them. Cascading of priorities and the link between prioritisation and resource allocation could be further improved. In 2025, ECHA decided on a re-organisation which is expected to contribute, among others, to leadership alignment and strengthen the link between prioritisation, cascading and resource allocation.

2.2 Risk management	ECHA has put lots of efforts to strengthen its agency-wide risk management increasing the level of engagement of management and MB involvement. ECHA's overall risk appetite has been reviewed at MB level and increased in some areas to allow for more flexibility and innovation. The impact of this decision however cannot yet be measured. Even if there have been improvements and a cost-risk benefits guidance developed, there are further efforts needed to embed the cost-risk-benefit approach in project and process risk management.
Operations and operational structure	
3.1 Activity management	The activity and process management is a strength for ECHA and allows synergies. Supplier's management has been strengthened, even though we continue to work in this area. The re-organisation is expected to bring further processes optimisation and synergies.
3.2 Information and data management	ECHA is reusing some of its existing platforms for new tasks, even if it is difficult to determine the exact cost savings. Better documentation and quantification of the cost savings when reusing existing platforms to prove the economies is an area for improvement. Roles and responsibilities between IT and operational directorates need to be better defined. Areas for attention refer to the timeliness and completeness of a security incidents report, as well as the increased number of data breaches. The Management survey 2025 reflected a negative perception on the efficiency, security and reliability of IT systems. On the other hand, the IT indicators in the Annual Report are positive, which indicates a gap between perception and indicators.
3.3 Change management	ECHA overall responds to changes flexibly whilst ensuring continuity of operations and taking stakeholders' requirements into account. At the moment, ECHA's organisational structure may be sometimes rigid and preventing innovation. This is an opportunity for improvement in the reorganisation of ECHA in 2026. Changes foreseen with the Basic Regulation may also provide further flexibility.
Evaluation and improvement	
4.1 Performance management	Performance based structures of ECHA ensure reliability of reporting, even if there are more efforts needed in this area to improve data consistency and audit trails. Ex-ante and ex-post controls in ECHA's management systems function overall well to capture non-conformities, complaints, risks, including potential fraud risks. No critical gaps were found from the analysis of non-conformities, complaints, risks and exceptions register. ECHA has performed retrospective analysis, following some data breaches, thus learning from mistakes. Potential area for improvement is the awareness raising among staff of how to quickly spot a data breach or a major incident and escalate it to the Management.
4.2 Assessments, audits, and evaluations	ECHA invests in audits, retrospective evaluations and assessments which adds value to the Management decision making. A potential area for improvement is to more systematically organise the overview and harmonised approach towards ex-ante evaluations and to better incorporate the lessons learnt from audits and retrospective evaluations in ECHA's planning cycle.

Statement of the manager in charge of risk management and internal control

I, the undersigned,

Shay O'MALLEY

Director of Resources

In my capacity as manager in charge of risk management and internal control, I declare that in accordance with ECHA's Internal Control Framework, I have reported my advice and recommendations on the overall state of internal control in the Agency to the Executive Director.

I hereby certify that the information provided in the present Annual Report and in its annexes is, to the best of my knowledge, accurate, reliable and complete.

Done in Helsinki, on 9 March 2026

signed

Shay O'MALLEY

Director of Resources

Part IV. Management assurance

Review of the elements supporting assurance

The Authorising Officer performed an assessment of the effectiveness and efficiency of the internal control system, acknowledging that the system, based on ECHA's Integrated Management Strategy and Framework, is functioning well. The assessment considered a broad range of input and fed into the Management Review 2024, where senior management of the Agency reflected on the strengths, weaknesses, risks and opportunities of the management system. No significant weaknesses that may have a potential impact on the declaration of assurance of the Authorising Officer were identified and reported in any of the relevant parts as set out in the present report.

Reservations

Not applicable

Part V. Declaration of assurance

Declaration of assurance by the Authorising Officer

I, the undersigned,

Dr Sharon McGuinness

Executive Director of the European Chemicals Agency

In my capacity as Authorising Officer,

Declare that the information contained in this report gives a true and fair view,

State that I have reasonable assurance that the resources assigned to the activities described in this report have been used for their intended purpose and in accordance with the principles of sound financial management, and that the control procedures put in place give the necessary guarantees concerning the legality and regularity of the underlying transactions,

This reasonable assurance is based on my own judgement and on the information at my disposal, such as the results of the self-assessment, ex post controls, the work of the Internal Audit Capability, the recommendations of the Internal Audit Service and the lessons learnt from the reports of the Court of Auditors[25] for years prior to the year of this declaration,

Confirm that I am not aware of anything not reported here which could harm the interests of the Agency.

Done in Helsinki, on 6 March 2026

signed

Dr Sharon McGuinness

Executive Director

[25] With regard to the implementation of EU legislation and the fee regulations under the Agency's remit, this assurance has to be limited to the field of competences of the Agency. Since ECHA's mandate does not include controls or inspections at national level, it cannot be confirmed that only registered or authorised substances and products, for which a fee has been paid to the Agency, are circulating on the EU market.

Annexes

Annex I - Key indicators

Indicator	Target / *estimate* full year	Result full year 2025	Progress towards target
Co-ordinated and prioritised regulatory actions on chemicals between the Commission, Member States and ECHA.			
Number of new substances added to Registry of Intention (SVHC, CLH, Restrictions) originating from ARNs	*15*	53	100%
Increased numbers of substances covered by hazard identification or risk management outputs delivered for the decision making process under relevant regulatory areas.			
Number of compliance check decisions concluded in the follow up to dossier evaluation	**200**	180	90%
Number of new and updated entries published in the Candidate List	*15*	9	60%
Number of opinions on biocidal active substances [approval & renewal] finalised and submitted to the Commission	*15*	19	100%
Number of opinions on Union authorisation [approval & renewal] of biocidal products finalised and submitted to the Commission	*15*	21	100%
Number of RAC opinions on OELs completed and provided to the Commission	**5**	5	100%
Transparent, independent and high-quality opinions and decisions developed that contribute to the implementation of EU legislation and policy.			
Number of RAC and SEAC opinions adopted on applications for authorisation and review reports (number of uses) and submitted to the Commission	**35**	40	100%
Number of RAC and SEAC opinions on restriction proposals delivered to the Commission	**0**	0	100%
Number of RAC opinions on proposals for harmonised classification and labelling adopted	*50*	41	82%
Number of opinions on applications for authorisation and review reports submitted to the Commission requiring further consideration by committees	*14*	13	93%
Number of opinions on restrictions submitted to the Commission requiring further consideration by committees (Art 77 (3)(c)	*0*	0	100%
Number of requests from the Commission for a BPC opinion [pursuant to Article 75(1)(g)] to revise earlier adopted opinions	*0-4*	0	100%
Percentage of Scientific Committee (RAC and SEAC) membership positions filled	*>67%*	70.8%	100%
Data that is reliable, findable, accessible, interoperable, shared, secure and reusable.			
Number of data products identified	*50*	40	80%
Number of data provision and analysis requests	*50*	28	56%
Number of personal data breaches reported, as per legal requirements, to the European Data Protection Supervisor	*5*	2	100%
Regulatory processes and IT tools streamlined and interoperable with high levels of user satisfaction and use.			
Percentage of administrative tooling modernised	**>80%**	90.0%	100%
Number of high impact security incidents	**<2**	0	100%
Percentage of internal IT user satisfaction	**>85%**	89.1%	100%
Percentage of availability of key systems	**>98%**	99.9%	100%
Stakeholders proactively engaged, involved, and satisfied with ECHA supports, tools and services.			
Number of high-level meetings conducted with Member States and European Union institutions	**15**	39	100%
Number of Helpdesk questions answered (across all our legal basis)	*10 000*	8 533	85%
Number of access to documents requests received and concluded	*150*	140	93%
Number of appeals submitted REACH	*10*	9	100%
Number of appeals submitted BPR	*2*	0	100%
SME supports being easily accessible, used, and levels of satisfaction increased.			
Number of SME dedicated dialogues held	**1**	4	100%
Use of alternative and non-animal methods increased.			
Number of NAMs projects initiated	**3**	6	100%
Number of Member States NAMs cases supported	**4**	8	100%
An organisation that values its people and puts in place the processes, systems and tools to help them work, learn and succeed.			
Percentage of staff participating in biannual staff satisfaction survey	**>80%**	94.3%	100%
Percentage turnover rate of Temporary Agents (TA)	**<5%**	1.5%	100%
Percentage turnover rate of Contract Agents (CA)	**<10%**	5.4%	100%
Percentage of establishment plan posts filled	**>95%**	95.6%	100%
Percentage of expenditure committed	**>95%**	99.0%	100%

Annex II - Budget implementation reports and statistics on financial management

Budget overview

The initially budgeted total payment appropriations for the Agency's expenditure in 2025, as concluded by the Management Board in December 2024, amounted to EUR 139.3 million, including c. EUR 1.3 million for the separately budgeted other tasks ("Contribution Agreements and SLAs" in the table below). During the year, two budget amendments were approved by the Management Board, primarily for the following reasons:

a) Incorporating the fee income shortfall observed in REACH/CLP during the first half of the year, decreasing the budgeted REACH fee income estimates by EUR 3.2 million, while incorporating the observed fee income surplus in BPR, increasing the BPR fee income estimates by EUR 3.3 million.
b) Incorporating a release in BPR EU Contribution of EUR 1.5 million, associated with the BPR fee income surplus, to be transferred by the EU Commission to REACH, increasing equally the associated REACH EU Contribution, to finance the observed REACH fee income shortfall.
c) Reducing the Title 1 salary expenditure estimates by €2.8 million, primarily by taking account of the latest available statistical information at the time of the budget amendment.
d) Increasing the Title 2 expenditure by €2.5 million, primarily by allocating part of the BPR fee income surplus (EUR 1.8 million), to finance IT services - the public cloud - as these services serve a 'joint purpose' (Article 78 of BPR).
e) Releasing EUR 3.6 million of Environmental Policy related EU Contribution (including EFTA) and associated expenditure, to reflect the fact that the adoption of the Water Protection legislation and 'One-Substance-One-Assessment' package did not take place in 2025, as initially budgeted.
f) Incorporating the agreed amounts to be collected under the Contribution Agreements and SLAs (EUR 3.3 million increase).

Overall, the final total expenditure, concluded in the 2nd amending budget in September 2025, amounted to EUR 138.7 million, including EUR 4.6 million for the separately budgeted Contribution Agreements and SLAs.

Revenue	Initial voted budget	Amending budgets	Final voted budget
Total revenue	**139 264 674**	**(577 174)**	**138 687 500**
Expenditure	**Initial voted budget**	**Amending budgets**	**Final voted budget**
Commitment appropriations	**139 271 699**	**(514 675)**	**138 757 024**
Payment appropriations:	**139 264 674**	**(577 174)**	**138 687 500**
Title 1 "Staff"	90 830 233	(2 753 121)	88 077 112
Title 2 "Administrative Expenditure"	19 177 922	2 460 371	21 638 293
Title 3-5 "Operational Expenditure"	27 951 807	(3 565 295)	24 386 512
Title 6 "Contribution Agreements and SLAs"	1 304 712	3 280 871	4 585 583

Revenue

The budget funding of ECHA in 2025 consisted of the following (amounts in EUR):

Description	Initial voted Budget 2025	Amendments 2025	Final voted Budget 2025	Entitlements established 2025	Revenue received 2025
Fees and charges from Registrations & Updates	30 358 824	(3 153 230)	27 205 594	26 880 266	26 880 266
Fees and charges from Authorisations	1 550 000	(100 000)	1 450 000	1 340 599	1 340 599
Fees SME Administration	700 000	-	700 000	643 245	643 245
Fees and charges from CLP	100 000	-	100 000	101 650	101 650
Fees and charges from appeals	-	14 350	14 350	14 350	14 350
Total REACH Fees & Charges Income	**32 708 824**	**(3 238 880)**	**29 469 944**	**28 980 110**	**28 980 110**
Fees relating to Biocidal Active Substances	706 832	600 000	1 306 832	1 338 925	1 338 925
Fees for Union Authorisation of Biocidal products	3 366 287	1 876 016	5 242 303	5 615 525	5 615 525
Miscellaneous fees	2 252 618	800 000	3 052 618	3 372 626	3 372 626
Fees and charges from appeals	-	-	-	-	-
Total BPR Fee & Charges Income	**6 325 737**	**3 276 016**	**9 601 753**	**10 327 076**	**10 327 076**
REACH EU Contribution	76 316 097	1 483 158	77 799 255	77 799 255	77 799 255
BPR EU Contribution	8 014 498	(1 483 158)	6 531 340	6 531 340	6 531 340
ENV EU Contribution	10 513 365	(3 483 742)	7 029 623	7 029 623	7 029 623
EFTA Contribution – REACH	2 090 339	-	2 090 339	2 090 339	2 090 339
EFTA Contribution – BPR	222 730	-	222 730	222 730	222 730
Confederation of Switzerland Contribution – BPR	356 847	(64 243)	292 604	292 604	292 604
EFTA Contribution – ENV	291 525	(97 196)	194 329	194 329	194 329
Total EU and other Contributions	**97 805 401**	**(3 645 181)**	**94 160 220**	**94 160 220**	**94 160 220**
Contribution Agreement EUON	-	624 000	624 000	624 000	624 000
Contribution Agreement EUCLEF	-	1 123 400	1 123 400	1 123 400	1 123 400
Contribution Agreement OELs	-	975 000	975 000	975 000	975 000

Contribution Agreement SCBTH	520 000	-	520 000	-	-
SLA with EFSA	784 712	558 471	1 343 183	1 343 183	1 343 183
Total Contribution Agreements and SLAs	**1 304 712**	**3 280 871**	**4 585 583**	**4 065 583**	**4 065 583**
Bank Interest Income	1 120 000	(250 000)	870 000	697 982	697 982
Other income – miscellaneous	-	-	**-**	227 983	218 333
Total Administrative Operations Income	**1 120 000**	**(250 000)**	**870 000**	**925 965**	**916 315**
Total	**139 264 674**	**(577 174)**	**138 687 500**	**138 458 954**	**138 449 304**

REACH/CLP Revenue

A) REACH/CLP Fees and Charges

ECHA is financed through a combination of fees paid by industry and an EU balancing contribution, in accordance with the REACH Regulation (No 1907/2006). The fees and charges collected by ECHA are determined by the REACH Fee Regulation and by the decisions of the Management Board.

Due to the one-off nature of REACH fees and their dependence on strategic decisions of the chemical industry players, there is high uncertainty as to their amount and timing.

The budgetary revenue from REACH fees and charges in 2025, in terms of cash received, amounted to EUR 28.97 million (EUR 28.59 million in 2024). In addition, EUR 0.01 million (EUR 0.03 million in 2024) was recorded in relation to REACH appeal fees[26] giving a total of fees and charges of EUR 28.98 million (EUR 28.62 million in 2024). It is to be noted that, in 2025, the REACH fees on non-SME entities were adjusted to inflation via the REACH Fee regulation amendment, which was adopted by the European Commission and become effective in November 2025, leading to a 19.5% increase in the fee levels from thereon. The increased fee levels were initially budgeted to be effective in April 2025, and the delay in their adoption led to the decrease of REACH fee estimates for the year by EUR 3.2 million, formalised with the 2nd amending budget in September 2025.

Broken down by fee category, ECHA collected a total of EUR 26.88 million from REACH Registration and Update fees (EUR 26.20 million in 2024), EUR 1.34 million from Applications for Authorisation (EUR 1.71 million in 2024) and EUR 0.10 million from CLP fees (EUR 0.07 million in 2024). The additional registration fee income that was generated through the SME company size verification process (which is included in the REACH registrations and updates income) amounted to EUR 0.56 million in 2025 (EUR 0.36 million in 2024). On top of the additional registration fees, the Agency generated EUR 0.64 million in administrative charges (EUR 0.62 million in 2024) levied on companies who were deemed non-eligible for the granted SME fee rebates.

[26] Income from appeal fees is recognised by ECHA only when a case has been decided and the Board of Appeal rules that the fee should not be refunded to the applicant.

B) REACH/CLP Contributions from the General Budget of the EU

During 2025, the Agency received an EU balancing contribution for REACH/CLP of EUR 77.80 million (EUR 74.81 million in 2024) and a European Free Trade Association (EFTA) contribution of EUR 2.09 million (EUR 2.50 million in 2024).

BPR Revenue

A) BPR Fees and Charges

In accordance with the Biocidal Products Regulation (BPR, No 528/2012), ECHA is financed through a combination of fees paid by industry and a balancing EU contribution. The biocide fees and charges collected by ECHA are determined by the Biocidal Products Regulation and the BPR Fees and Charges Regulation. The budgetary revenue from biocidal product fees and charges for 2025, in terms of cash received, amounted to EUR 10.33 million (EUR 5.69 million in 2024). The significant increase in the collected BPR fee income relates primarily to the significantly increased number of Union Authorisation applications, for single products and for product family, received in 2025 compared to 2024 (45 applications in 2025 vs. 25 applications in 2024). Furthermore, to be noted that in 2025, BPR fees were adjusted to inflation, via the BPR Fee regulation amendment, which was adopted by European Commission and became effective in August 2025, leading to a 19.5% increase in the fee levels from thereon.

B) BPR Contributions from the General Budget of the EU

During 2025, the Agency received an EU balancing contribution of EUR 6.53 million (EUR 7.83 million in 2024) and an EFTA contribution of EUR 0.22 million (EUR 0.23 million in 2024). In addition, the Agency received a contribution from the Confederation of Switzerland of EUR 0.29 million (EUR 0.35 million in 2024).

Environmental Policy Revenue

In accordance with the Prior Informed Consent (PIC) Regulation (EU) No 649/2012, Persistent Organic Pollutants (POPs) Regulation (EU)2019/2021, Waste Framework Directive (SCIP) (EU) 2018/851 amending Directive 2008/98/EC, the revised Drinking Water Directive (DWD) Directive (EU) 2020/2184, the 8th Environmental Action Programme (8th EAP), the Batteries Regulation and the Industrial Emissions Directive (IED), ECHA is fully financed through an EU contribution for these activities. In 2025, the EU contribution amounted to EUR 6.87 million for these tasks (EUR 4.72 million in 2024). Furthermore, in 2025, the Agency received for the first time EUR 0.16 million contribution with respect to Packaging and Packaging Waste Regulation (PPWR) 2025/40. Finally, an EFTA contribution of EUR 0.19 million (EUR 0.19 million in 2024) was received in total for the above tasks.

Contribution Agreements and Service Level Agreements

The Agency has signed contribution agreements with the European Commission to implement the European Union Observatory for Nanomaterials (EUON) and the European Union Chemicals Legislation Finder (EUCLEF). Furthermore, the Agency has signed a contribution agreement with the European Commission for the implementation of tasks under the Serious Cross-Border Threats to Health (SCBTH), to carry out and deliver public health risk assessments on chemical incidents. ECHA has also signed a Service Level Agreement with the European Commission to provide opinions for occupational exposure limits (OELs). Additionally, the Agency has signed a Service Level Agreement with the European Food Safety Authority (EFSA) for developing and implementing IUCLID software solutions for plant protection products. In 2025, ECHA received an amount of EUR 4.07 million in aggregate for implementing these tasks. It is to be noted that the Agency has also signed a Service Level Agreement with the European Commission for work with respect to the Instrument for Pre-Accession Assistance (IPA), for which no additional funding

was collected during 2025.

Other miscellaneous income

The table below shows the other miscellaneous income received by the Agency in 2025 and 2024 (amounts in EUR).

Description	Revenue received 2025	Revenue received 2024
Bank Interest income	**697 982**	**1 440 219**
Legal recoveries	54 958	-
Late interest income	18 473	3 425
Recoveries from other EU agencies	43 092	43 092
Other recoveries	3 317	2 264
Building maintenance related	98 493	-
Other income - miscellaneous	**218 333**	**48 781**
Total Administrative Operations Income	**916 315**	**1 489 000**

Fee Invoicing

In accordance with Article 71 of the Agency's Financial Regulation, the number of debit notes issued, and their global amount shall be provided in the Agency's report on budgetary and financial management. In addition, where fees and charges are entirely determined by legislation or decisions of the Management Board, the Authorising Officer may abstain from issuing recovery orders and directly draw up debit notes after having established the amount receivable. Where the Agency uses a separate invoicing system, the Accounting Officer shall regularly, and at least on a monthly basis, enter the accumulated sum of fees and charges received into the accounts.

The Agency uses a separate invoicing and debtors' system for daily transactions related to fee income, namely the REACH-IT (for REACH/CLP fees and charges) and REACH-NG (for Biocidal Products fees and charges) invoicing modules. The invoices raised and the payments received are recorded in the central accounting system on a monthly basis.

A) REACH Fees and Charges

The total net invoiced by the Agency in 2025 amounted to EUR 29.29 million (EUR 28.46 million in 2024 and EUR 31.00 million in 2023). The table below depicts the breakdown of the net invoiced REACH fees during the years 2023-2025.

REACH	2025		2024		2023	
Description	**No of Invoices**	**EUR**	**No of Invoices**	**EUR**	**No of Invoices**	**EUR**
Invoices issued	5 877	31 162 480	5 670	30 915 187	5 743	33 510 775

Credit Notes	134	(1 122 201)	150	(1 998 717)	131	(1 790 613)
Unpaid	110	(754 196)	76	(455 495)	136	(710 941)
Considered paid	21	(350)	14	(259)	14	(259)
Net Invoiced		**29 285 733**		**28 460 716**		**31 008 962**
Write offs	8	(159 200)	-	-	5	(87 682)

On 31 December 2025, the amount to be recovered for REACH fees and charges, before any year-end accounting adjustments, stood at EUR 2.05 million relating to 314 open invoices (on 31 December 2024, the amount to be recovered for REACH fees and charges, before any year end accounting adjustment, stood at EUR 1.89 million relating to 274 open invoices).

B) Biocidal Products Fees and Charges

The total net invoiced by the Agency in 2025 amounted to EUR 10.08 million (EUR 5.98 million in 2024 and EUR 2.88 million in 2023). The table below depicts the breakdown of the net invoiced BPR fees during the years 2023-2025.

BPR	2025		2024		2023	
Description	**No of Invoices**	**EUR**	**No of Invoices**	**EUR**	**No of Invoices**	**EUR**
Invoices issued	2 151	10 726 682	1 098	6 599 900	608	3 618 500
Credit Notes	204	(637 045)	56	(603 600)	51	(589 500)
Unpaid	14	(11 374)	15	(17 000)	14	(149 500)
Considered paid	2	(52)	-	-	-	-
Net Invoiced		**10 078 212**		**5 979 500**		**2 879 500**

On 31 December 2025, the amount to be recovered for Biocidal product fees and charges before any year end accounting adjustments, stood at EUR 0.23 million relating to 58 open invoices (on 31 December 2024, the amount to be recovered for BPR fees and charges, before any year end accounting adjustment, stood at EUR 0.48 million relating to 72 open invoices).

Expenditure

ECHA's expenditure budget consists of commitment appropriations (CA) and payment appropriations (PA). The initial CAs and PAs totalled EUR 138.0 million each, while the level concluded in the final budget is EUR 134.2 million for the CAs and EUR 134.1 million for the PAs. These commitment and payment appropriations consist of C1 funds only, i.e. excluding the R0 funds ("Contribution Agreements and SLAs") of EUR 1.3 million in the initial budget and EUR 4.6 million in the final budget.

Budget expenditure includes payments made during the year and the carry-over of budgetary appropriations. Summary of the execution of appropriations per title and a more detailed breakdown is provided in the 'Statistics on Financial Management and Budget (Expenditure)' section below.

Changes and implementation of the commitment appropriations for 2025 (C1)

The initially adopted budget for the Agency in 2025 was EUR 138.0 million and the overall net decrease during the year, including 23 transfers and two amending budgets, was c. EUR 3.8 million, to arrive at EUR 134.2 million as the final budget.

The final executed amount totalled EUR 132.9 million corresponding to an execution rate of 99.0 % for the appropriations.

Carry-over of appropriations to 2026

The commitment and payment appropriations carried over to 2026 totals EUR 13.4 million, corresponding to 10.1 % of the committed amount.

The carry-over of staff related expenditure, budgeted in Title 1, was insignificant and mainly relates to the commitments for training and interim services.

In Title 2, covering the Agency's infrastructure, the carry-over totalled EUR 2.4 million, stemming mainly from commitments related to ECHA's IT services.

The operational expenditure required to implement the Work Programme for the different regulations is budgeted in Title 3 for REACH and CLP, in Title 4 for Biocides, and in Title 5 for the Environmental Policy (PIC, POPs, Waste Framework Directive (SCIP), Drinking Water Directive, the 8th Environmental Action Programme, Batteries Regulation and Industrial Emissions Directive). The carry-over in operational titles totalled EUR 10.7 million and is mostly related to IT development projects.

Implementation of the appropriations carried over from 2024 (C8)

The amount carried over from 2024 totalled EUR 15.9 million and the finally executed amount was EUR 15.8 million, corresponding to 99.45 %. The cancelled 0.55 % relates mostly to meetings and IT services that took place at the end of 2024, where the actual costs were lower than anticipated, and lower than anticipated costs for legal services related to debt collection of administrative charges in Title 3.

Late interest payments

During the year 2025, ECHA processed one late interest payment on a commercial invoice, totalling EUR 231.

Procurement procedures

During 2025 budget implementation:

- ECHA signed a total 316 contracts and purchase orders[27].
- 256 were specific contracts and orders under existing framework contracts (FWC) and 60 were contracts resulting from new tendering procedures.
- ECHA concluded 5 new FWCs:
    - for IT services related to Microsoft technologies,
    - for telephony services,
    - for cleaning services,
    - for medical services,
    - for QSAR toolbox Phase V services.

ECHA joined 3 inter-institutional FWCs:

- for Flash and mixed mode Eurobarometer Surveys (COM),

[27] This number also includes amendments with budgetary commitment.

- for accident and death insurance coverage for non-statutory staff (PMO),
- for Provision of Services and Equipment in the field of Audio-visual and Conference Technology (COM).

A total of 17 contracts were signed following negotiated procedures without prior publication, based on the relevant rules of the Financial Regulation (Annex 1–11.1):

- 13 for legal services
- 4 (for technical reasons) for subscriptions to scientific database and professional journals, as well as for specialised software and specialised database.

In 2025, the performance of the suppliers of the Agency was satisfactory overall and in accordance with the terms of the contracts, with few exceptions, which were successfully addressed by ECHA. Only one contract underwent a reduction of price due to low performance. Preliminary market consultation in the form of questionnaires to be filled in by potential tenderers continues being an established practice in ECHA, before launching specific procurements.

The Agency established its outsourcing policy based on the following principles:

- Compliance with the rules (legality)
- Sound financial management (Effectiveness, Efficiency and Economy)
- Preventing concentration and overdependence on suppliers
- Ensuring good performance of contractors
- Integrating ESG principles into procurement
- Supporting innovation.

ECHA continued relying on IT tools (e.g., Cloudia for the DPS, PPMT) in its procurement and contract processes. The annual list of contractors is published by ECHA by 30 June of each year for the previous year on ECHA's website [28].

Acts of delegation and sub delegation

For the purposes of the budget implementation, and in line with Article 41(1) of ECHA's Financial Regulation, the Executive Director as the Authorising Officer of the Agency has delegated financial powers to the directors for the budget lines which they are responsible for, in line with their activities.

In accordance with Article 41(2), the directors have further sub-delegated financial powers to the heads of unit of their directorates.

For efficiency reasons, the Executive Director has also delegated financial powers to authorise payments below EUR 8 000 to staff in the Finance Unit.

[28] https://echa.europa.eu/view-article/-/journal_content/title/annual-list-of-awarded-contracts

Statistics on Financial Management and Budget (Expenditure)

Budget 2025: Breakdown and changes in commitment appropriations and implementation of the appropriations for the current year (C1) per Title* (EUR)

Title	Description	Budget 2025 (1)	Transfers / amendments (2)	Final Available Commitment Appropriations (3)	Executed Commitment Amount (4)	% Committed (4)/(3)	Final Available Payment Appropriations (5)	Executed Payment Amount (6)	% Paid (6)/(5)	Carried over RAL (C8) (7)	Carried over % (7)/(4)	Cancelled (3)-(4)
A-1	STAFF	90 830 233	-2 753 121	88 077 112	86 992 037	98.8%	88 077 112	86 813 561	98.6%	178 477	0.2%	1 085 075
A-2	BUILDING. EQUIPMENT AND MISCELL OPER EXPEND	19 177 922	2 460 371	21 638 293	21 593 224	99.8%	21 638 293	19 143 997	88.5%	2 449 227	11.3%	45 069
B0-3	OPERATIONAL EXPENDITURE - REACH/CLP	19 313 155	-123 596	19 189 559	19 117 967	99.6%	19 120 035	11 031 318	57.7%	8 028 028	42.0%	71 592
B0-4	OPERATIONAL EXPENDITURE – BIOCIDES	2 786 274	-97 147	2 689 127	2 673 474	99.4%	2 689 127	1 390 854	51.7%	1 282 620	48.0%	15 653
B0-5	OPERATIONAL EXPENDITURE - ENVIRONMENTAL POLICY	5 859 403	-3 282 053	2 577 350	2 514 773	97.6%	2 577 350	1 088 379	42.2%	1 426 395	56.7%	62 577
		137 966 987	**-3 795 546**	**134 171 441**	**132 891 475**	**99.0%**	**134 101 917**	**119 468 108**	**89.1%**	**13 364 746**	**10.1%**	**1 279 966**

**Note: As ECHA operates with both differentiated (multi-annual) and non-differentiated (annual) budget lines, the funds reserved for commitments (commitment appropriations) do not equal the funds reserved for payments (payment appropriations). The results for the administrative titles 1 and 2 are combined for all three regulations.*

Budget 2025: Breakdown and changes in commitment appropriations and implementation of the appropriations for the current year (C1) per Regulation and Title (EUR)

REACH/CLP

Title	Description	Budget 2025 (1)	Transfers / amendments (2)	Final Available Commitment Appropriations (3)	Executed Commitment Amount (4)	% Committed (4)/(3)	Final Available Payment Appropriations (5)	Executed Payment Amount (6)	% Paid (6)/(5)	Carried over RAL (C8) (7)	Carried over % (7)/(4)	Cancelled (3)-(4)
A-1	STAFF	76 838 171	-1 872 526	74 965 645	74 066 275	98.8%	74 965 645	73 903 759	98.6%	162 516	0.2%	899 370
A-2	BUILDING. EQUIPMENT AND MISCELL. OPER EXPEND	15 840 959	82 899	15 923 858	15 886 643	99.8%	15 923 858	13 863 581	87.1%	2 023 062	12.7%	37 215
B0-3	OPERATIONAL EXPENDITURE - REACH/CLP	19 313 155	-123 596	19 189 559	19 117 967	99.6%	19 120 035	11 031 318	57.7%	8 028 028	42.0%	71 592
		111 992 285	**-1 913 223**	**110 079 062**	**109 070 885**	**99.1%**	**110 009 538**	**98 798 658**	**89.8%**	**10 213 606**	**9.4%**	**1 008 177**

BIOCIDES

Title	Description	Budget 2025 (1)	Transfers / amendments (2)	Final Available Commitment Appropriations (3)	Executed Commitment Amount (4)	% Committed (4)/(3)	Final Available Payment Appropriations (5)	Executed Payment Amount (6)	% Paid (6)/(5)	Carried over RAL (C8) (7)	Carried over % (7)/(4)	Cancelled (3)-(4)
A-1	STAFF	10 116 432	-431 623	9 684 809	9 591 312	99.0%	9 684 809	9 583 522	99.0%	7 791	0.1%	93 497
A-2	BUILDING. EQUIPMENT AND MISCELL. OPER EXPEND	2 167 106	2 227 385	4 394 491	4 389 394	99.9%	4 394 491	4 112 632	93.6%	276 763	6.3%	5 097
B0-4	OPERATIONAL EXPENDITURE - BIOCIDES	2 786 274	-97 147	2 689 127	2 673 474	99.4%	2 689 127	1 390 854	51.7%	1 282 620	48.0%	15 653
		15 069 812	**1 698 615**	**16 768 427**	**16 654 180**	**99.3%**	**16 768 427**	**15 087 007**	**90.0%**	**1 567 173**	**9.4%**	**114 247**

ENVIRONMENTAL POLICY

Title	Description	Budget 2025 (1)	Transfers / amendments (2)	Final Available Commitment Appropriations (3)	Executed Commitment Amount (4)	% Committed (4)/(3)	Final Available Payment Appropriations (5)	Executed Payment Amount (6)	% Paid (6)/(5)	Carried over RAL (C8) (7)	Carried over % (7)/(4)	Cancelled (3)-(4)
A-1	STAFF	3 875 630	-448 972	3 426 658	3 334 450	97.3%	3 426 658	3 326 280	97.1%	8 170	0.2%	92 208
A-2	BUILDING. EQUIPMENT AND MISCELL. OPER EXPEND	1 169 857	150 087	1 319 944	1 317 186	99.8%	1 319 944	1 167 784	88.5%	149 403	11.3%	2 758
B0-5	OPERATIONAL EXPENDITURE - ENVIRONMENTAL POLICY	5 859 403	-3 282 053	2 577 350	2 514 773	97.6%	2 577 350	1 088 379	42.2%	1 426 395	56.7%	62 577
		10 904 890	**-3 580 938**	**7 323 952**	**7 166 410**	**97.8%**	**7 323 952**	**5 582 443**	**76.2%**	**1 583 967**	**22.1%**	**157 542**

Budget 2025: Implementation of differentiated appropriations (EUR)

Budget line		Available commitment appropriations	Commitments made	%	Available payment appropriations	Payments made	%
B3-111	Substance evaluation and Rapporteurs (Multiannual)	904 817	893 913	98.79%	735 282	735 282	100.00%
B3-801	Cooperation with international organisations for IT programs	400 000	399 994	100.00%	500 011	500 004	100.00%
Total		**1 304 817**	**1 293 907**	**99%**	**1 235 293**	**1 235 286**	**100.00%**

Out of the total available commitment appropriations of EUR 2 250 358, the amount of EUR 945 541 is stemming from commitments made in earlier financial years. The available commitment appropriations for 2025 totalled EUR 1 304 817 out of which EUR 1 293 907 (c.99%) were committed.

Budget 2025: Implementation of assigned revenue (C4, C5, R0) (EUR)

Title	Description	FS	Commitments Appropriations	Commitments Established	Com %	Payments Appropriations	Payments Executed	Pay%	Carried over commitment appropriations	Carried over payment appropriations
A-1	STAFF	C4	43 092	0	0.0%	43 092	0	0.0%	43 092	43 092
A-2	BUILDING. EQUIPMENT AND MISCELL. OPER EXPEND	C4	117 518	98 493	83.8%	117 518	98 493	83.8%	19 025	19 025
B0-3	OPERATIONAL EXPENDITURE - REACH/CLP	C4	57 302	0	0.0%	57 302	0	0.0%	57 302	57 302
B0-4	OPERATIONAL EXPENDITURE - BIOCIDES	C4	378	0	0.0%	378	0	0.0%	378	378
B0-5	OPERATIONAL EXPENDITURE - ENVIORNMENTAL	C4	42	0	0.0%	42	0	0.0%	42	42
		C4	**218 333**	**98 493**	**45.1%**	**218 333**	**98 493**	**45.1%**	**119 840**	**119 840**

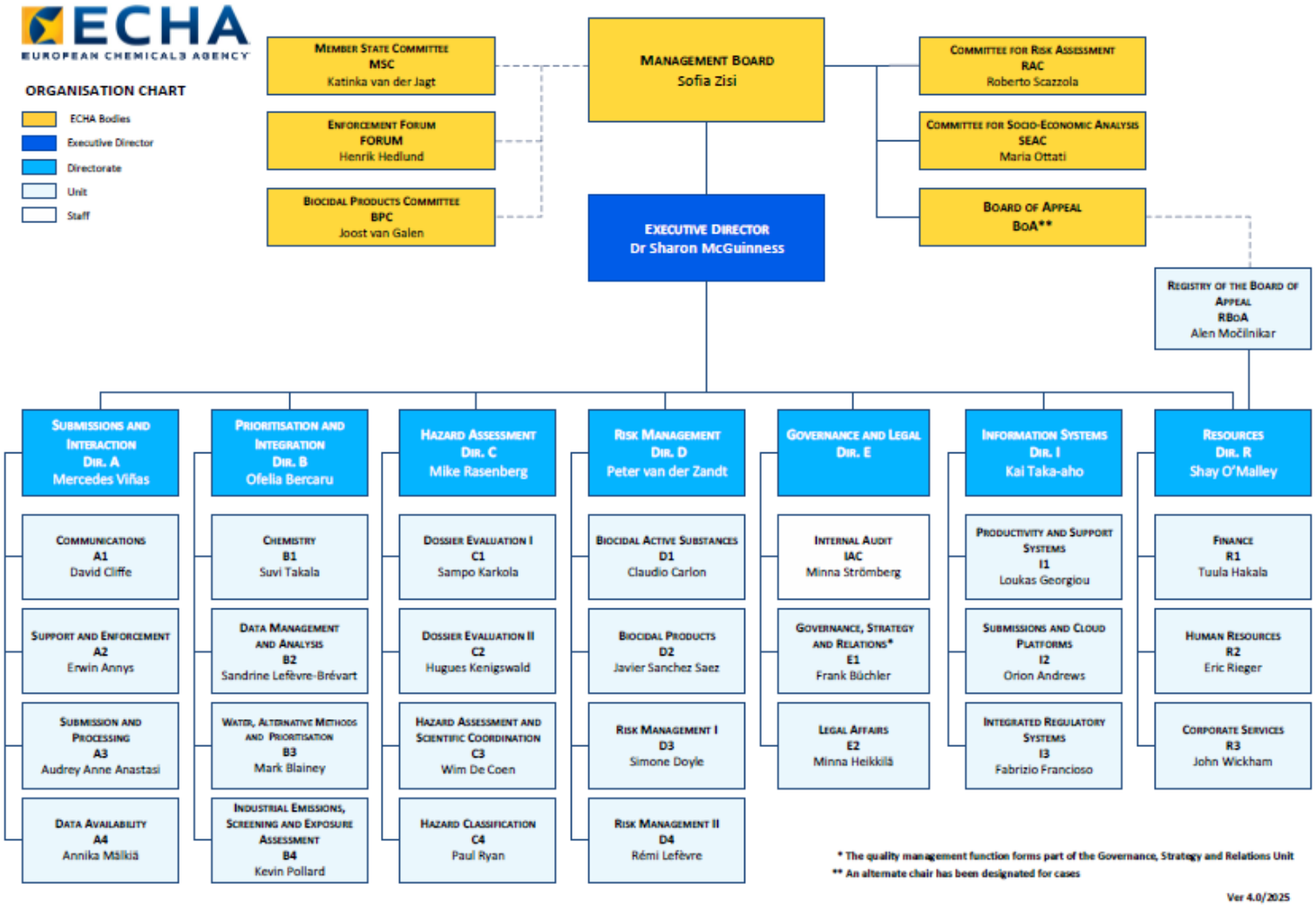
Title	Description	FS	Commitments Appropriations	Commitments Established	Com %	Payments Appropriations	Payments Executed	Pay%	Carried over commitment appropriations	Carried over payment appropriations
A-1	STAFF	C5	43 602	43 602	100.0%	43 602	43 602	100.0%	0	0
A-2	BUILDING. EQUIPMENT AND MISCELL. OPER EXPEND	C5	3 425	0	0.0%	3 425	0	0.0%	0	0
B0-3	OPERATIONAL EXPENDITURE - REACH/CLP	C5	1 243	1 243	100.0%	1 243	1 243	100.0%	0	0
		C5	**48 270**	**44 845**	**92.9%**	**48 270**	**44 845**	**92.9%**	**0**	**0**

BL	Description	FS	Commitments Appropriations	Commitments Established	Com %	Payments Appropriations	Payments Executed	Pay%	Carried over commitment appropriations	Carried over payment appropriations
B6-000	IPA programme	R0	286 756	177 071	61.7%	286 756	177 071	61.7%	109 685	109 685
B6-010	EUON	R0	1 555 974	874 298	56.2%	1 555 974	638 653	41.0%	681 676	917 321
B6-011	EUCLEF	R0	2 895 930	1 578 899	54.5%	2 895 930	1 056 428	36.5%	1 317 031	1 839 502
B6-020	Occupational exposure limits	R0	1 717 455	1 088 347	63.4%	1 717 455	836 340	48.7%	629 108	881 114
B6-021	Further development of IUCLID (w/ third parties)	R0	1 883 194	1 740 074	92.4%	1 883 194	1 138 951	60.5%	143 120	744 244
B6-022	Support to cross-border threats to health (SCBTH)	R0	520 000	119 000	22.9%	520 000	113 731	21.9%	401 000	406 269
		R0	**8 859 309**	**5 577 690**	**63.0%**	**8 859 309**	**3 961 174**	**44.7%**	**3 281 620**	**4 898 135**

Budget 2025: Implementation of the appropriations carried forward from previous year (C8) Per Title (EUR)

Title	Description	Carried Forward from 2024	Paid	Cancelled	% Cancelled
A-1	STAFF	251 781	242 545	9 235	3.7%
A-2	BUILDING. EQUIPMENT AND MISCELL. OPER EXPEND	3 385 157	3 349 536	35 621	1.1%
B0-3	OPERATIONAL EXPENDITURE - REACH/CLP	9 180 538	9 152 277	28 260	0.3%
B0-4	OPERATIONAL EXPENDITURE - BIOCIDES	1 557 644	1 556 385	1 259	0.1%
B0-5	OPERATIONAL EXPENDITURE - ENVIRONMENTAL POLICY	1 482 657	1 470 092	12 565	0.8%
		15 857 776	**15 770 835**	**86 940**	**0.5%**

Annex III – Organisational chart as of 31 December 2025



Annex IV - Establishment plan and additional information on human resources management

Last establishment plan adopted

Category and grade	Establishment plan in voted EU Budget 2025				Posts filled 31 December 2025[29]			
	TA				TA			
	REACH/ CLP	Biocides	ENV	TOTAL	REACH/ CLP	Biocides	ENV	TOTAL
AD 15				0				0
AD 14	5			5	5			5
AD 13	11	1		12	1			1
AD 12	15	2		17	13	1		14
AD 11	26	1		27	22	1		23
AD 10	51	8		59	37	7		44
AD 9	57	9	1	67	51	5	1	57
AD 8	59	11	1	71	56	8	1	65
AD 7	53	9	20	82	42	5	1	48
AD 6	27	2	11	40	51	11	7	69
AD 5	6			6	29	5	4	38
Total AD	310	43	33	386	307	43	14	364
AST 11				0				0
AST 10				0				0
AST 9	2			2	1			1
AST 8	10			10	6			6
AST 7	18	1		19	11			11
AST 6	19	1	1	21	21	1	1	23
AST 5	24	3	3	30	15	2		17
AST 4	14	3	1	18	7	4	3	14
AST 3	6	1	1	8	14	2	1	17
AST 2	1			1	19		1	20
AST 1				0				0
Total AST	94	9	6	109	94	9	6	109
AST/SC 6				0				0
AST/SC 5				0				0
AST/SC 4				0				0
AST/SC 3				0				0
AST/SC 2				0				0
AST/SC 1				0				0
TOTAL AD+AST	404	52	39	495	401	52	20	473

[29] Under recruitment (included in figures): REACH: 2 TAs and ENV: 1 TA

	CA estimated need of FTEs 2025					CA posts filled 31 December 2025[30]				
	REACH/ CLP	Biocides	ENV	Other tasks	TOTAL	REACH/ CLP	Biocides	ENV	Other tasks	TOTAL
CA FG IV	27	7	20	14	**68**	19	6	4	11	**40**
CA FG III	62	7	4	1	**74**	51	7	7	3	**68**
CA FG II	8	1		0.5	**9.5**	17	2			**19**
CA FG I					**0**					**0**
TOTAL	**97**	**15**	**15**	**15.5**	**151.5**	**87**	**15**	**11**	**14**	**127**

Percentage of posts filled on 31 December 2025			
	REACH/ CLP	Biocides	ENV
TA posts	99.26%	100%	51.28%[31]
CA posts	89.69%	100%	45.83%

Geographical and gender balance (as per 31 December 2025)[32]

	Nationality		TA			CA			OVERALL	%
			Male	Female	Total	Male	Female	Total	Sum	
1	AT	Austrian	3	4	**7**	0	0	**0**	**7**	**1.2%**
2	BE	Belgian	12	10	**22**	1	1	**2**	**24**	**4.0%**
3	BG	Bulgarian	2	10	**12**	2	3	**5**	**17**	**2.9%**
4	CY	Cypriot	1	0	**1**	0	0	**0**	**1**	**0.2%**
5	CZ	Czech	0	3	**3**	1	0	**1**	**4**	**0.7%**
6	DE	German	17	5	**22**	0	1	**1**	**23**	**3.9%**
7	DK	Danish	1	1	**2**	0	0	**0**	**2**	**0.3%**
8	EE	Estonian	0	6	**6**	1	2	**3**	**9**	**1.5%**
9	ES	Spanish	16	14	**30**	5	3	**8**	**38**	**6.4%**
10	FI	Finnish	60	91	**151**	15	30	**45**	**196**	**32.9%**
11	FR	French	19	16	**35**	3	7	**10**	**45**	**7.6%**
12	GR	Greek	14	8	**22**	4	8	**12**	**34**	**5.7%**
13	HR	Croatian	0	0	**0**	0	1	**1**	**1**	**0.2%**
14	HU	Hungarian	2	7	**9**	0	3	**3**	**12**	**2.0%**
15	IE	Irish	10	7	**17**	0	1	**1**	**18**	**3.0%**
16	IS	Iceland	0	0	**0**	0	0	**0**	**0**	**0.0%**
17	IT	Italian	25	19	**44**	7	6	**13**	**57**	**9.6%**
18	LI	Liechtenstein	1	0	**1**	0	0	**0**	**1**	**0.2%**
19	LT	Lithuanian	2	6	**8**	0	0	**0**	**8**	**1.3%**
20	LU	Luxembourger	0	0	**0**	0	0	**0**	**0**	**0.0%**
21	LV	Latvian	2	5	**7**	0	0	**0**	**7**	**1.2%**
22	MT	Maltese	0	3	**3**	0	0	**0**	**3**	**0.5%**

[30] Under recruitment (included in figures): REACH: 1 CA.
[31] Various posts under the Environmental Directives (e.g.: Water Protection Directives [7 TAs and 4 CAs], POPs-in-Waste [1 AD], RoHS Directive [3 ADs], ELV [1 AD] and Data Regulation [7 AD and 8 CAs] were part of ECHA's Establishment Plan as of 2025 and were foreseen in the Authorised Budget. However, those posts only arrived / are expected to arrive during 2026. This negatively affects the 'posts filled' ratio.
[32] Data in the table includes statutory staff in place on the indicated date. Posts under recruitment are not included.

23	NL	Dutch	10	5	**15**	2	1	**3**	**18**	**3.0%**
24	NO	Norwegian	0	1	**1**	0	0	**0**	**1**	**0.2%**
25	PL	Polish	9	10	**19**	1	2	**3**	**22**	**3.7%**
26	PT	Portuguese	5	6	**11**	0	2	**2**	**13**	**2.2%**
27	RO	Romanian	3	6	**9**	3	5	**8**	**17**	**2.9%**
28	SE	Swedish	3	2	**5**	1	0	**1**	**6**	**1.0%**
29	SI	Slovenian	3	2	**5**	1	1	**2**	**7**	**1.2%**
30	SK	Slovakian	1	2	**3**	0	2	**2**	**5**	**0.8%**
31	Other	Other	0	0	**0**	0	0	**0**	**0**	**0.0%**
		TOTAL	**221**	**249**	**470**	**47**	**79**	**126**	**596**	**100.0%**

Senior management – gender and nationality overview[33]

NATIONALITY		MALE	FEMALE	TOTAL	%
ES	Spanish	0	1	1	14.3%
FI	Finnish	1	0	1	14.3%
IE	Irish	1	1	2	28.6%
NL	Dutch	2	0	2	28.6%
RO	Romanian	0	1	1	14.3%
Total	**OVERALL**	**4**	**3**	**7**	**100%**

Middle management – gender and nationality overview[31]

NATIONALITY		MALE	FEMALE	TOTAL	%
BE	Belgian	2	0	2	8%
DE	German	2	0	2	8%
ES	Spanish	2	0	2	8%
FI	Finnish	2	4	6	24%
FR	French	2	1	3	12%
GR	Greek	1	0	1	4%
IE	Irish	3	1	4	16%
IT	Italian	2	0	2	8%
MT	Maltese	0	1	1	4%
SE	Swedish	1	0	1	4%
SI	Slovenian	1	0	1	4%
Total	**OVERALL**	**18**	**7**	**25**	**100%**

[33] Data in the table includes statutory staff in place on the indicated date. Posts under recruitment are not included.

Results of the screening / benchmarking exercise

Key functions	Type of contract (official, TA or CA)	Function group, grade of recruitment (or bottom of grade bracket if published with such	Indication whether the function is dedicated to administrative support or operations subject to definitions used in screening methodology
Core functions			
Executive Director	TA – 5+5 years	AD 14	Management-Operations
Director (Head of Directorate) (Level 2)	TA – 5+5 years + indefinite	AD 12	Management-Operations
Head of Unit (Level 3)	TA – 5+5 years + indefinite	AD 9	Operations/Administration
Administrator	TA – 5+5 years + indefinite	AD 5 and higher depending on profile	Operations/Administration
Administration			
Head of Administration (Head of Directorate) (Level 2)	TA – 5+5 years + indefinite	AD 12	Management-Administration
Head of Human Resources (Level 3)	TA – 5+5 years + indefinite	AD 9	Administration
Head of Finance (Level 3)	TA – 5+5 years + indefinite	AD 9	Administration
Head of Communications (Level 3)	TA – 5+5 years + indefinite	AD 9	Administration
Head of IT (Level 3)	TA – 5+5 years + indefinite	AD 9	Administration
Assistant	TA - 5+5 years + indefinite	AST 1 and higher depending on profile, up to AST 4	Operations/Administration

Key functions	Type of contract (official, TA or CA)	Function group, grade of recruitment (or bottom of grade bracket if published with such	Indication whether the function is dedicated to administrative support or operations subject to definitions used in screening methodology
Special functions			
ECHA Committee Chair	TA - 5+5 years + indefinite	AD 10	Operations
Data Protection Officer	TA - 5+5 years + indefinite	AD 6	Administration
Accounting Officer	TA - 5+5 years + indefinite	AD 8	Administration
Internal Auditor	TA - 5+5 years + indefinite	AD 10	Administration

Benchmarking against previous results

ECHA undertook the benchmarking (job screening) exercise in 2025, in accordance with the Commission's requirements. The 2025 results indicate a decrease of 0.7% in the percentage of general operational, and an increase of 0.7% in the percentage of the programme management and implementation staff. The overall administrative support and coordination figures reduces further with 0.4%.

Job Type (sub) category	2024 (numbers in %)	2025 (numbers in %)
Administrative support and Coordination	**12.2**	**11.8**
Administrative Support	9.6	9.1
Coordination	2.6	2.7
Operational	**83.7**	**83.7**
Top level Operational Coordination	2.4	2.4
Programme management and Implementation	61.9	62.6
Evaluation & Impact assessment	2.3	2.3
General operational	17.1	16.4
Neutral	**4.1**	**4.5**
Finance/ Control	4.1	4.5
Linguistics	0.0	0.0

Annex V – Human and financial resources by activity

Work Programme activity	Actual consumption of the human resources	Executed budget 2025
1. REACH	314	
1.1 Dossier preparation	26	6 293 268
1.2 Dossier submission and processing	37	11 897 368
1.3 Identification and prioritisation of substances and groups of substances	28	7 911 027
1.4 Evaluation	84	16 988 013
1.5 Authorisation	28	5 865 925
1.6 Restrictions	35	7 161 543
1.7 Classification and labelling	38	7 151 828
1.8 Data management	24	8 139 693
1.9 Data dissemination	7	2 672 646
1.10 Promotion of alternatives to animal testing	7	1 906 408
2. Biocides	51	13 166 117
3. Environmental policy	33	6 322 400
4. Tasks under grant, cooperation and service-level agreements	18.5	5 577 690
5. Governance and enablers	194	37 415 239
Overall TOTAL	**610.5**	**138 469 165**

Annex VI – Contribution, grant and service-level agreements

	General information					Financial and HR impacts		
	Actual or expected date of signature	**Total amount**	**Duration**	**Counterpart**	**Short description**		**2024**	**2025**
Grant agreements								
1. IPA	20.12.2022	675 103	42 months	Commission DG NEAR		Amount		
						Number of CA	1.5	1.5
						Number of SNEs	-	-
						Amount		
						Number of CA	**1.5**	**1.5**
						Number of SNEs	-	-
Contribution agreements								
1. EUCLEF	10.12.2021	5 829 200	5 years (2021-2025)	Commission DG GROW		Amount	1 053 400	1 123 400
						Number of CA	0	0
						Number of SNEs	-	-
2. EUON	09.12.2021	3 066 000	5 years (2021-2025)	Commission DG GROW		Amount	619 000	624 000
						Number of CA	3	3
						Number of SNEs		
3. SCBTH	15.11.2024	520 000	3 years (2025-2027)	Commission DG SANTE		Amount		520 000
						Number of CA	0	0
						Number of SNEs	-	-
						Amount	**1 672 400**	**2 267 400**
						Number of CA	**3**	**3**
						Number of SNEs	-	-
Service-level agreements								
1. IUCLID for EFSA	26.03.2021	Annual fee of 888 183 plus project cost	N/A	EFSA		Amount	1 239 712	1 343 183
						Number of CA	4	4
						Number of SNEs	-	-
2. OEL	23.02.2022	195 000 per task unit	24 months per case	Commission DG EMPL		Amount	975 000	975 000
						Number of CA	4	4
						Number of SNEs	-	-
Total service-level agreements						**Amount**	**2 214 712**	**2 318 183**
						Number of CA	**8**	**8**
						Number of SNEs	-	-
TOTAL (contribution agreements and SLAs)						**Amount**	**3 887 112**	**4 585 583**
						Number of CA	**12.5**	**12.5**

Annex VII - Environment management

Context of the Agency and its environmental management strategy

ECHA implements the EU's chemicals legislation to protect health and the environment. Our work also contributes to a well-functioning internal market, innovation and the competitiveness of Europe's chemicals industry.

Through ECHA's work, better knowledge and regulation of harmful chemicals helps to protect workers, consumers and the environment, makes recycling easier, and encourages industry to develop safer alternatives.

ECHA has an environmental policy which commits ECHA to continually improve its environmental performance. ECHA supports the political priorities of the EU, as enshrined in the European Green Deal and the EUAN Strategy 2021-2027. To this end, ECHA has pledged to climate-neutral by 2030.

Finally, ECHA's environmental objectives are fully aligned with the "Charter on greenhouse gases (GHG) reduction and responsible environmental management", adopted by the Head of EU Agencies in February 2024, which set additional ambitious objectives to achieve Carbon Neutrality by 2030.

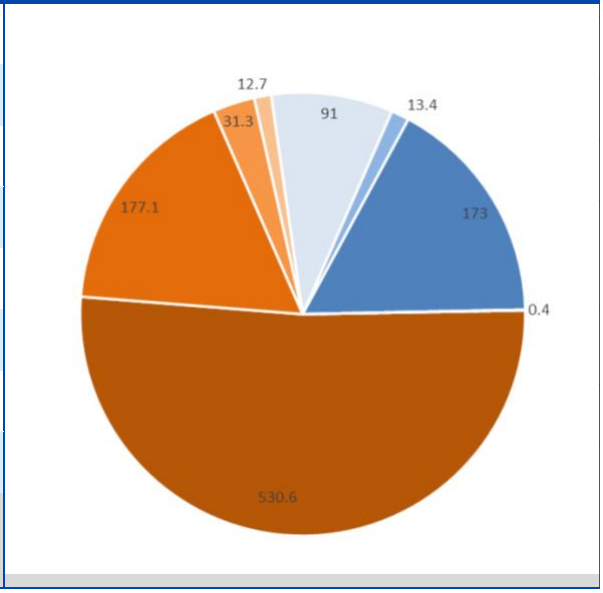
Overview of the Agency's environmental management system

ECHA established an Environmental Management System (EMS) in 2015 - part of the Agency's integrated management system - which aims to deliver on ECHA's strategy, vision, goals and objectives. ECHA's environmental objectives, targets and actions reflect our commitment to incorporating sustainability measures within all areas of our activities. This is implemented through our multi-annual environmental work programme (2023-2025) and the internal follow-up of actions and reporting of progress.

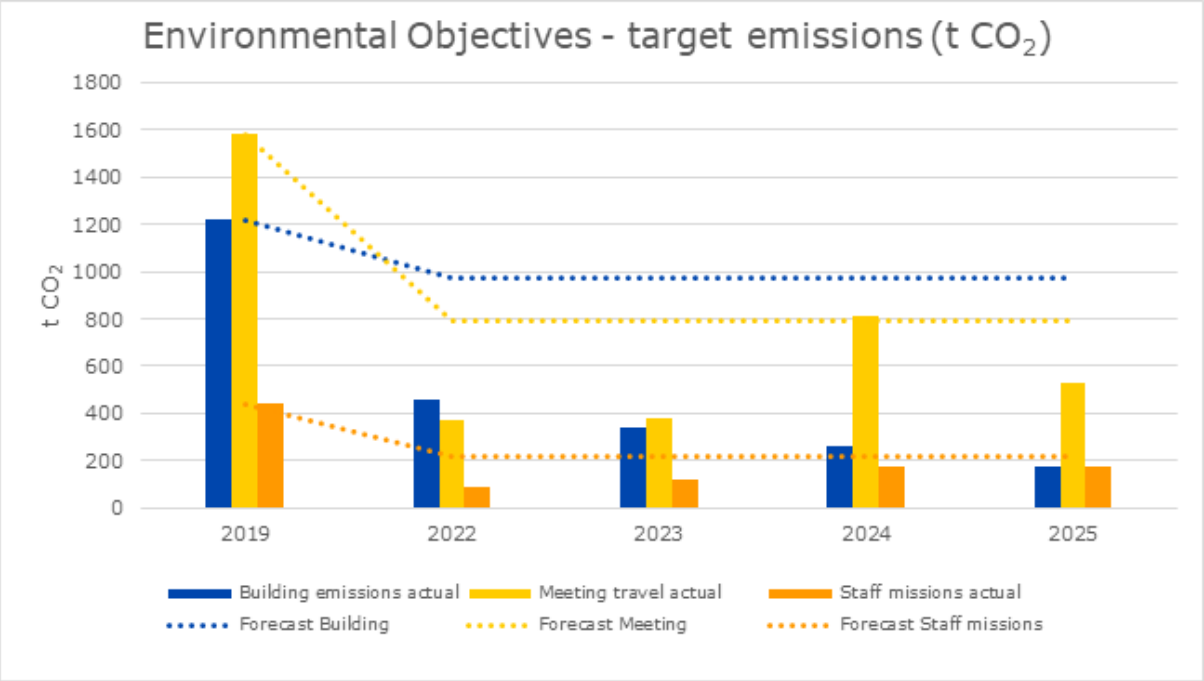
In 2025, ECHA was recertified under ISO 14001:2015 standard (Environmental Management System) and ECHA's EMAS registration was renewed and extended until 2027.

ECHA's carbon footprint in 2025

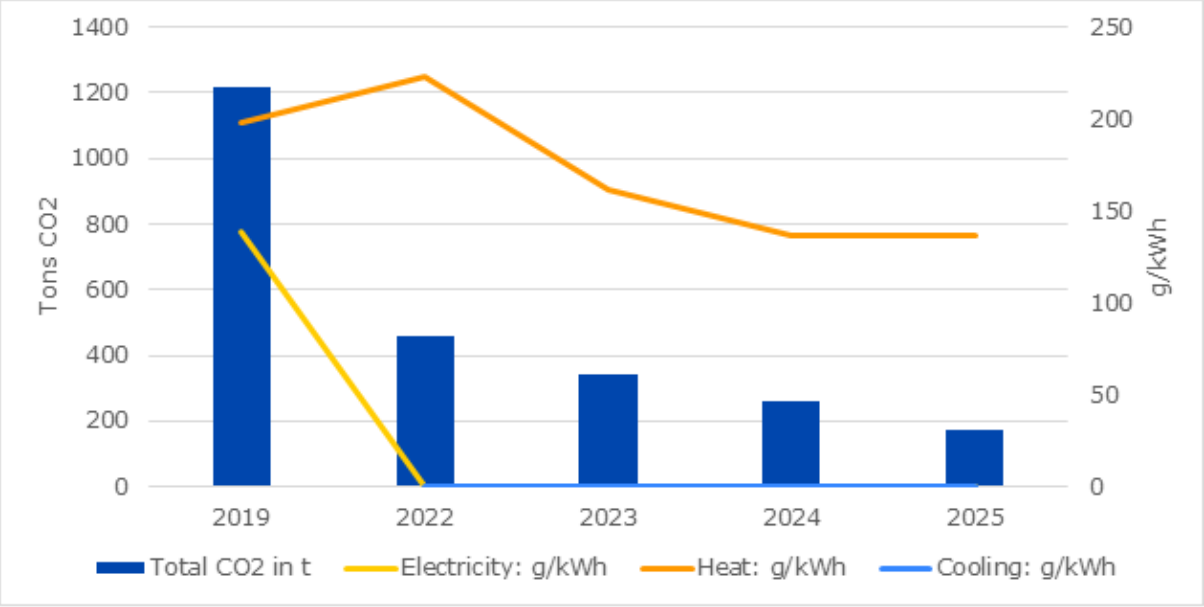
Origin	Tons CO2	%
District heating	173	16.8%
Paper consumption	0.4	0.04%
Visitor flights	530.6	51.5%
Visitor Hotel nights	31.3	3%
Teleworking	13.4	1.3%
Commuting	91	8.8%
Staff flights	177.1	17.2%
Staff Hotel nights	12.7	1.2%
Total CO2 emissions in tonnes	**1 029.6**	**100%**



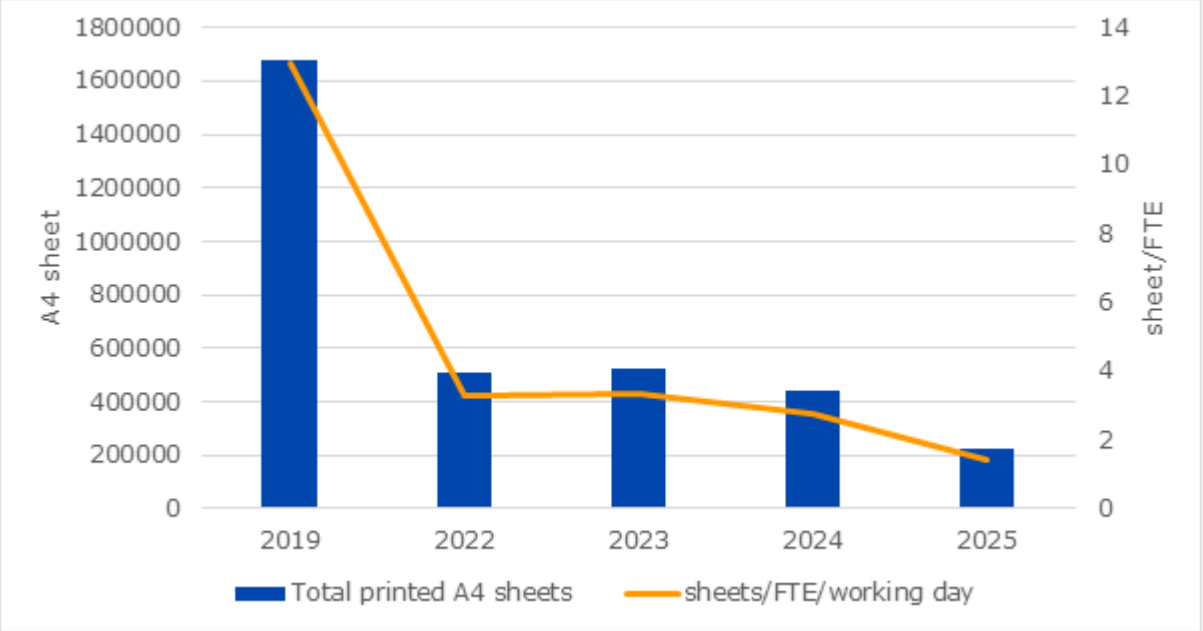
Environmental aspects, indicators and targets



Building emissions



Printing paper consumption



Actions taken to improve and communicate environmental performance

2025 was the last year of ECHA's updated multi-annual Environmental Work Programme (EWP) and using the results, the 2026-2028 EWP was prepared and approved by ECHA Management.

Goal	Multi-annual work programme	Actions implemented in 2025
F1 Inform and involve all staff in greening ECHA.	Green communications plan, training and info sessions. Continue ECHA's active participation in the Greening Network of the EU Agencies.	Promoted over 30 staff information campaigns. Participated GIME and EUAN GN meetings.
F1 Inform and involve all staff in greening ECHA.	Continue to develop ECHA's sustainability reporting in all areas (for example, energy and climate).	ECHA organised a seminar on Sustainable Aviation. The meeting covered EU legislative developments and how the aviation industry is addressing the challenges. Speakers from the Commission (DG MOVE), EASA and FINNAIR participated. The event was attended by ECHA staff and colleagues from 20 other EU Institutions and Agencies.
F1 Inform and involve all staff in greening ECHA.	Continue to develop ECHA's sustainability reporting in all areas (for example, energy and climate).	Communicated the outcomes and improvement areas of the 2025 ISO, EMAS, Internal Audit (under the IAC) and 2 specific internal audits (under the EMAS Regulation) of its Environmental Management System.

F1 Inform and involve all staff in greening ECHA.	Training	ECHA introduced a training module for newcomers who are now required to follow the EMAS e-learning course.
F4 Improve sustainability of events.	Guidelines for sustainable meeting organisation.	ECHA introduced relevant guidelines for sustainable meeting organisation.
F6 Extend scope of ECHA's carbon footprint.	Establish baseline of aviation emissions.	ECHA reviewed the scope of ECHA's CO_2e footprint to include RFI for aviation travel in order to ensure a comprehensive overview and to avoid reporting gaps and reputational damage which will be included in future environmental reports.

Annex VIII – Annual Accounts

The Final Annual Accounts will be published here, once adopted in June 2026

EUROPEAN CHEMICALS AGENCY
P.O. BOX 400, FI-00121 HELSINKI, FINLAND
ECHA.EUROPA.EU