

# Newsletter

**Global Environmental and  
Chemical Regulations, Policies,  
and Standards**

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# NEWSLETTER

*Global Environmental and Chemical Regulations, Policies, and Standards*  
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## WHO IS IAEG?

The International Aerospace Environmental Group ([IAEG](#)) is a non-profit organization of global aerospace companies created to collaborate on and share innovative environmental solutions for the industry. The group works to promote the development of voluntary consensus standards and provide accessible solutions for key environmental issues.

Members of IAEG recognize that there are currently a wide variety of different laws and regulations impacting health and the environment in place worldwide. The complexity and variability of requirements and guidance has led to an increased burden for the industry and its supply chain.

IAEG work groups address such issues as chemical material declarations and reporting requirements, the development of alternative technologies and greenhouse gas reporting and management. They create a forum for diverse and often competitive businesses to come together and share information on industry-wide opportunities for the promotion and adoption of global environmental requirements. In addition, IAEG provides opportunities for wider education on environmental issues and the supply chain via its meetings agendas and bespoke seminars.

## IAEG WORK GROUP 9 NEWSLETTER

The Aerospace and Defense (AD) industry is committed to developing an approach to help the AD industry evaluate emerging global environmental and chemical regulations and their impact on compliance and potential operational risk for companies and their supply chain. The objectives are to:

- » Maintain a list of global regulations, policies and standards considered and to be considered, including executive summaries of those regulations.
- » Develop a method to evaluate designated emerging regulation's potential impact on compliance and/or operational risk, business continuity and/or impact on supply chain.
- » Develop summaries of the associated timeline for regulations (e.g., deadlines) and highlight the specific impacts.
- » Develop communication materials and conduct informational webinars, as appropriate, for member companies and/or AD supply chain companies, as appropriate.

This Newsletter summarizes environmental and chemical regulations relevant to the AD industry. Contact Lisa Brown at [myrna.l.brown@lmco.com](mailto:myrna.l.brown@lmco.com) or Lindsey Bean at [lindsey.bean@ngc.com](mailto:lindsey.bean@ngc.com) for any questions on this Newsletter. For general assistance on IAEG matters, contact Christer Hellstrand at [chellstrand@iaeg.com](mailto:chellstrand@iaeg.com) or Amanda Myers at [Amanda.Myers@sae.org](mailto:Amanda.Myers@sae.org).

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## AFRICA

### Egypt

#### Egyptian standards on labels for prints and varnishes used for electrical insulation (consultation)

On 17 November 2022, Egypt published 3 draft standards for paints and varnishes. Comments on the draft were due on 16 January 2023.

- » The first draft standard – “Environmental performance label for paints (EPI) – requirements” – establishes the requirements for the environmental performance label in paints and varnishes, including requirements on the content of volatile substances and the limits of hazardous substances and formaldehyde. This draft standard complies with the European Union (EU) regulations Decision 2014/312/EU (establishing the ecological criteria for the award of the EU Ecolabel for indoor and outdoor paints and varnishes) and Directive 2004/42/CE (on the limitation of emissions of volatile organic compounds in certain paints and varnishes and vehicle refinishing products)
- » The second draft standard – “Varnishes used for electrical insulation – Part 1: Definitions and general requirements” – establishes general requirements for varnishes used for electrical insulation, including quality and safety requirements; this draft standard is technically identical to IEC 60464-1:2013
- » The third draft standard – “Varnishes used for electrical insulation – Part 2: Methods of test” – includes test methods for varnishes used for electrical insulation; this draft standard is technically identical to IEC 60464-2:2014

More information can be found in this [announcement](#) on labels for paints, [Part 1](#) for varnishes, and [Part 2](#) for varnishes.



## ASIA

### India

#### Postponement of implementation of Quality Control Order for methylene chloride (published)

The Ministry of Chemicals and Fertilizers in India published a notice on 18 November 2022 postponing the implementation of the 2021 methylene chloride (dichloromethane; CAS No. 75-09-2) Quality Control Order (QCO). The notification amends the enforcement date for the QCO to 20 May 2023.

Quality Control Orders (QCOs) are gazette orders issued pursuant to Section 16 of the Bureau of Indian Standards (BIS) Act, 2016. They are issued by the government to announce that relevant standards prescribed by the BIS concerning certain

products will be effective from the date specified in the QCO. QCOs apply to products/articles (objects whose function is determined by their shape, surface, or design to a greater degree than their chemical composition). These orders require anyone handling the products/articles, including companies manufacturing or importing and downstream users, to comply with the requirements set out in the QCOs or face a ban. By the issuance of QCOs, the use of Standard Mark under a license or a certificate of conformity from BIS is mandated.

Penalties will be applied under the Bureau of Indian Standards Act. Penalties for non-compliance include fines of up to 5 lakh rupees.

More information can be found in Hindi and English in this [notification](#) and this [order](#), both in the Gazette of India.

## Indian Standard for trisodium phosphate (consultation)

On 17 October 2022, the Bureau of Indian Standards (BIS) published a notice inviting comments on the draft “Indian Standard Trisodium Phosphate – Specification (Fifth Revision of IS 573).” Comments were due on 17 December 2022. The standard prescribes the requirements and methods of sampling, testing, marking, and packaging for trisodium phosphate, which is an effective cleaning agent.

BIS is revising the standard and published a draft for stakeholder comments. This revision adds instrumental test methods for determining arsenic, chlorides, lead, and sulphates as alternate test methods. Also, the packing and marking clause has been updated.

More information can be found in this [here](#).

## South Korea

### Amendment to greenhouse gas process test standard (published)

On 25 November 2022, South Korea’s National Institute of Environmental Research issued an amendment to the greenhouse gas process test standard. The amendment aims to implement test standards needed to be established to prepare Tier 4 applications. Tier 4 is the level of complexity of calculation methods such as activity data, emission factors, oxidation rates, conversion rates, and greenhouse gas emissions. The higher the calculation grade, the higher the reliability and accuracy. A Tier 4 application is recommended for large-scale combustion facilities and waste incineration facilities, but there is no process test standard, and there are no companies using it.

The amendment entered into force on 25 November 2022. No penalties have been stipulated in this amendment.

Information can be found [here](#) in Korean.

## Eleven substances to be designated as permitted substances under K-REACH (consultation)

On 23 November 2022, the South Korean Ministry of Environment (MoE) announced a consultation period for eleven substances to be designated as permitted substances under K-REACH. Permitted substances are substances that must not be manufactured, imported, or used prior to obtaining permission from the MoE. The eleven substances are:

- » benzene (CAS No. 71-43-2)
- » bisphenol A (4,4'-isopropylidenediphenol; CAS No. 80-05-7)
- » dibutyl phthalate (CAS No. 84-74-2)
- » benzyl butyl phthalate (CAS No. 85-68-7)
- » 4,4'-methylenebis[2-chloroaniline] (CAS No. 101-14-4)
- » di-(2-ethylhexyl)phthalate (CAS No. 117-81-7)
- » orange lead (CAS No. 1314-41-6)
- » lead monoxide (CAS No. 1317-36-8)
- » chromium trioxide (CAS No. 1333-82-0)
- » lead sulfochromate yellow (CAS No. 1344-37-2)
- » strontium chromate (CAS No. 7789-06-2)

The consultation is opened from 15 December 2022 and stakeholders may comment on the harmfulness, main use, exposure, and alternative materials and technology for each substance. In addition, stakeholders may comment on the types of people who may be exposed to chemicals during their handling and the socio-economic impact of designation as a permitted substance. The consultation deadline is 13 February 2023.

Information can be found [here](#) in Korean.



## EUROPE

### United Kingdom

#### Request for Information on three substances proposed as persistent organic pollutants (consultation)

On 31 October 2022, the United Kingdom (UK) opened a consultation to request information on three substances to feed into their draft Risk Profiles and Risk Management Evaluations. The consultation concluded on 28 November 2022. The UK is proposing the three substances as persistent organic pollutants (POPs) to the United Nation's POP Review Committee (POPRC) for listing under the Stockholm Convention. The three substances are:

- » chlorinated paraffins (C14 to C17 and at least 45% chlorine by weight)
- » long-chain perfluorocarboxylic acids (PFCAs), their salts, and related compounds
- » chlorpyrifos

The POPRC has requested additional information relating to the following:

- » adverse effects resulting from the long-range transport of chlorpyrifos to inform revisions to the draft Risk Profile for chlorpyrifos (Annex E of the Stockholm Convention)

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- » socio-economic considerations for long-chain perfluorocarboxylic acids, their salts, and related compounds, to assist the drafting of a Risk Management Evaluation (Annex F of the Stockholm Convention)
- » socio-economic considerations for chlorinated paraffins with carbon chain lengths in the range C14 to17 and with chlorination levels at or exceeding 45 percent chlorine by weight, to assist the drafting of a Risk Management Evaluation (Annex F of the Stockholm Convention)

The Stockholm Convention is an international environmental treaty that aims to protect human health and the environment from the harmful effects of POPs. The convention requires that “Parties<sup>1</sup>” take measures to eliminate or restrict the production and use of certain hazardous chemicals on the list of POPs in the convention. The UK is a party to the Stockholm Convention.

More information can be found [here](#).



## NORTH AMERICA

### United States

#### Updates to the North American Industry Classification System (NAICS) Codes for Toxics Release Inventory reporting (published)

On 28 November 2022, the US Environmental Protection Agency (EPA) published a rule to update the North American Industry Classification System (NAICS) codes for reporting to EPA’s Toxics Release Inventory (TRI). The new rule modifies the codes that some facilities use on their TRI reporting forms but does not change the reporting requirements.

Chemicals listed on the TRI are reported to the EPA annually by facilities in certain industry sectors that manufacture, process, or use such chemicals above certain quantities. Account must be taken of the quantities of such chemicals that were released into the environment or otherwise managed as waste as the EPA uses this information to analyze chemical management trends across industries. Hence, NAICS codes are used by stakeholders to identify the principal business activity at their respective facilities when reports are being submitted under the TRI.

NAICS codes are updated every five years and the most recent version became effective in January 2022. According to the publication, facilities are now required to use the 2022 NAICS codes on reports that are due to the agency by 1 July 2023.

This rule does not specify penalties for non-compliance.

More information can be found in the [Federal Register](#).

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<sup>1</sup> Defined as a state or regional economic integration organizations that have consented to be bound by the Stockholm Convention and for which the convention is in force

## Addition of twelve chemicals to the Toxics Release Inventory (effective)

In November 2022, the United States Environmental Protection Agency (EPA) added twelve chemicals to the list of toxic chemicals subject to Toxics Release Inventory (TRI) reporting requirements. This final rule will apply for the reporting year beginning 1 January 2023; reports are due 1 July 2024.

Chemicals covered by the TRI program are those that cause one or more of the following:

- » cancer or other chronic human health effects
- » significant adverse acute human health effects
- » significant adverse environmental effects

The twelve chemicals added to the TRI reporting requirements are:

- » dibutyltin dichloride (CAS No. 683-18-1)
- » 1,3-dichloro-2-propanol (CAS No. 96-23-1)
- » Formamide (CAS No. 75-12-7)
- » 1,3,4,6,7,8-hexahydro-4,6,6,7,8,8-hexamethylcyclopenta[g]-2-benzopyran (CAS No. 1222-05-5)
- » N-hydroxyethylethylenediamine (CAS No. 111-41-1)
- » nitrilotriacetic acid trisodium salt (CAS No. 5064-31-3)
- » p-(1,1,3,3-tetramethylbutyl)phenol (CAS No. 140-66-9)
- » 1,2,3-trichlorobenzene (CAS No. 87-61-6)
- » triglycidyl isocyanurate (CAS No. 2451-62-9)
- » tris(2-chloroethyl) phosphate (CAS No. 115-96-8)
- » tris(1,3-dichloro-2-propyl) phosphate (CAS No. 13674-87-8)
- » tris(dimethylphenol) phosphate (CAS No. 25155-23-1)

Facilities subject to reporting requirements for the chemicals above should begin to monitor and collect data on certain activities for these chemicals. Reporting forms for 2023 will be required to be submitted to the EPA for facilities that manufacture, process, or otherwise use TRI-listed chemicals above the reporting threshold before 1 July 2024.

There are no non-compliance provisions associated with this update.

More information can be found in in this [notice](#) from EPA's TRI program.



## SOUTH AMERICA

### Brazil

#### Chemical Law (Bill 6120/19) (draft)

On 23 November 2022, the Economic Development, Industry, Commerce, and Services Committee (CDEICS) adopted Brazil's draft chemicals law (Bill 6120/19). The draft law was initially proposed in 2019 to implement a REACH-like law and create the National Inventory of Substances Chemicals to consolidate substance information of chemicals produced or imported into the Brazilian territory.

According to Article 2 of Bill 6120/19, the Inventory aims to implement the Globally Harmonized System of Classification and Labelling of Chemical Products (GHS) established by the United Nations (UN) and applies to substances and mixtures. The draft law also sets registration and information sharing requirements for substances used as such or in mixtures imported or manufactured in quantities of 1 tonne or more. In addition, Article 4 of the Bill 6120/19 stipulates that the information submitted to the National Inventory will be publicly accessible unless exclusions apply. A complete list of exclusions has yet to be made available. Article 8 of Bill 6120/19 will set fines and penalties in case of violation or non-compliance with this law.

There is no indication of whether or when the Law will be promulgated and enforced.

Information can be in English in this [notice](#) from the Chamber of Deputies and in the [Draft 2019 Chemical Law](#). More information can be found [here](#).

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