Newsletter

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards

IAEG

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NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 4 – 2026

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 worldwide. The complexity and variability of requirements and guidance have 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 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 chemical, environmental, social, and governance 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 regulations 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 chemical, environmental, social, and governance regulations relevant to the AD industry. Contact Lisa Brown at myrna.l.brown@lmco.com for any questions on this Newsletter. For general assistance on IAEG matters, contact Damien Labadie at damien.labadie@aelyans.com.

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GLOBAL

The International Civil Aviation Organization adopted New global environmental standards (published)

The International Civil Aviation Organization (ICAO) adopted new global environmental standards on 27 March 2026, significantly tightening CO_2 emissions and noise limits for new aircraft. These standards are directly relevant to aerospace and defense firms involved in aircraft design, manufacturing, and certification. The CO_2 emissions standard is now 10% more stringent and will apply to new aircraft type designs from 2031 and to new deliveries of in-production aircraft types from 2035. Noise limits have also been raised—by six decibels for large aircraft and two for smaller ones—effective for new aircraft type designs from 2029. Supersonic aircraft will be required to meet subsonic noise limits starting in 2029.

While no explicit penalties are stated, non-compliance will prevent aircraft from receiving type certification, effectively barring them from global markets. The standards were developed through a multi-year consultation and technical review process and will be supported by ICAO with implementation guidance and documentation to ensure global readiness.

Greenhouse Gas Protocol issues a progress update to its Scope 3 Standard Revisions (proposal)

In March 2026, the Greenhouse Gas (GHG) Protocol released a Phase 1 Progress Update to its Scope 3 Standard Revisions. The most substantive proposed change is a new requirement for companies to report at least 95% of required Scope 3 emissions to remain in conformance with the standard, replacing the current qualitative requirement to account for all emissions while disclosing and justifying exclusions. The update also outlines targeted revisions under consideration related to data quality and boundary setting, limited structural changes to Scope 3 categories (including an optional new Category 16), and clarifications to investment-related reporting under Category 15, which would explicitly apply to all companies.

While no specific penalties for non-compliance are outlined in the draft proposals, the GHG Protocol notes that its standards are widely embedded in major global sustainability reporting frameworks, underscoring the practical importance of conformance as expectations around Scope 3 disclosure continue to evolve. The proposed 95% threshold is intended to ensure inclusion of the most material emissions sources by magnitude, while permitting limited exclusions of minor sources. For aerospace and defense firms with complex, multi-tier supply chains and product life cycles, the revised standard will likely increase in expectations around completeness, transparency, and data rigor in Scope 3 reporting, subject to the outcome of the forthcoming public consultation and finalization process.

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ASIA

China

L.N. 28 of 2026 sets the effective dates of the restrictions of Section 4 of the Mercury Control Ordinance (Amendment of Schedule 3) Notice 2025 (published)

On 26 March 2026, the Secretary for Environment and Ecology issued L.N. 28 of 2026 to announce the staggered dates on which the restrictions of Section 4 of L.N. 114 – the Mercury Control Ordinance (Amendment of Schedule 3) Notice 2025 – come into effect. The principal regulation, the Mercury Control Ordinance (Cap. 640), implements the Minamata Convention on Mercury by regulating the lifecycle of mercury and mercury-added products. L.N. 114 amended the principal regulation to gradually phase out certain mercury-added products to align with the resolutions adopted at the fifth meeting of the Conference of the Parties to the Minamata Convention. However, it did not include specific commencement dates for the restrictions of Section 4.

L.N. 28 of 2026 sets the staggered enforcement dates for prohibitions on specific mercury-added products, restricting manufacturers, importers, retailers, and distributors from manufacturing, importing, exporting, or supplying these items, although supply of the newly regulated products is subject to a grace period until 31 January 2029. On 27 March 2026, updated restrictions applied to batteries and switches/relays. On 31 December 2026, restrictions apply to compact fluorescent lamps for general lighting that are equipped with an integrated or non-integrated ballast and specific non-linear and linear halophosphate phosphor fluorescent lamps. On 31 December 2027, broader prohibitions take effect for linear and non-linear (including U-bend and circular) fluorescent lamps made of triband or halophosphate phosphor.

Penalties for non-compliance under the Mercury Control Ordinance include a fine at level five and imprisonment for one year for anyone who exports, imports, manufactures, or supplies a regulated mercury-added product. Records must be provided upon request by an authorized officer.

New Ecological and Environmental Code (published)

On 12 March 2026, China's National People's Congress (NPC) passed the Ecological and Environmental Code, which is its second formal legal code following the 2020 Civil Code. The Code consists of 1,242 articles and consolidates ten existing statutes into a single authoritative system, including the Environmental Protection Law, the Marine Environmental Protection Law, and the Law on the Prevention and Control of Air Pollution. The primary aim of the legislators is to create a systematic and authoritative legal framework to protect the ecological environment, safeguard public health, and propel green and low-carbon development. The intent of the law is to steer China towards green modernization and to harmonize economic growth with nature, aligning with the country's international pledges to peak carbon emissions before 2030 and achieve carbon neutrality before 2060.

The Code introduces comprehensive environmental requirements by updating existing anti-pollution laws and establishing new regulatory frameworks for chemical substances, electromagnetic radiation, and light pollution. Notably, it adopts a risk-based approach to regulating the entire lifecycle of chemicals, which requires pre-marketing registration for new chemical substances and designates new chemical pollutants for priority control. This update significantly affects manufacturers, importers, retailers, and distributors, as they are explicitly prohibited from producing, importing, or selling

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products that fail to meet new national emission limits, such as those for non-ionizing radiation. Furthermore, manufacturers and importers must phase out severely polluting technologies, materials, and products within specified deadlines, and those handling motor vehicles or non-road machinery must publicly disclose emission testing and pollution control information. Finally, the Code elevates China's carbon emission trading system into statutory law, requiring key industrial emitters to surrender emissions allowances based on verified annual carbon footprint reports.

The Code will enter into force on 15 August 2026. Penalties for non-compliance include fines, confiscation and destruction of non-compliant products, suspension of business operations, forced dismantling of facilities, and potential criminal liability.

More information can be found here in Chinese.

India

New guidelines mandating the verification of the rated capacity of portable sealed secondary lithium cells and batteries (in force)

On 10 February 2026, the Bureau of Indian Standards (BIS) published a guideline that mandates the measurement and verification of the rated capacity for portable sealed secondary lithium cells and batteries. Under the main regulation, the Electronics and IT Goods (Requirements for Compulsory Registration) Order, 2021, the standard IS 16046 (Part 2): 2018 previously required only the declaration of rated capacity. The current update was introduced to address consumer complaints regarding capacity misdeclaration and to protect consumer interests.

Manufacturers must now verify the rated capacity of these products through a discharge performance test at 20°C, in strict accordance with clause 7.3.1 of IS 16047 (Part 3):2018/IEC 61960-3: 2017. Existing licensees must submit third-party test reports for all lead models and provide an undertaking stating that all remaining models comply with this new clause. Applications currently being processed may continue without the immediate test, provided the applicant gives an undertaking to submit the required report at a later stage. Existing registrations remain valid provided that samples picked up during routine surveillance tests are within the specified rated capacity limits.

The BIS implementation guidelines came into force with immediate effect. The mandatory compliance date for new registrations, inclusions, and renewals takes effect on 1 May 2027. Existing licensees must ensure compliance by 30 April 2027, or by the last date of their license validity if it extends beyond April 2027. Consequently, no new licenses or changes in scope will be granted after 30 April 2027 unless the additional capacity test is included in the report.

Penalties for non-compliance include the suspension or cancellation of the license, or the deletion of the non-compliant model from the scope of the license.

Japan

Updates to the priority assessment chemicals list under the Chemicals Substances Control Law (published)

On 27 March 2026, Japan's Ministry of Health, Labor and Welfare, Ministry of Economy, Trade and Industry (METI), and Ministry of the Environment updated the priority assessment chemicals (PACs) list under the Chemical Substances Control

Law (CSCL). Under the CSCL, PACs are subject to enhanced regulatory oversight to assess the risk they pose to human health or the environment. If a PAC's national manufacturing and import volumes total ten tonnes or less, or its estimated emissions are 1 tonne or less, it is placed under quantitative monitoring. If a substance remains under monitoring for three consecutive years and is determined to pose no risk of harm, its PAC designation is revoked under Article 11 of the CSCL.

The notice (can also be found here in Japanese) features two tables detailing the priority numbers, names, designation basis, and reported volumes for three substances with revoked PAC designations (Table 1) and four substances remaining under quantitative monitoring (Table 2). Substances whose designation as priority assessment chemicals is revoked after quantitative monitoring:

- salts of benzyl(dimethyl)(octyl)ammonium (CAS No. 959-55-7)
- [dimethyl(octadecyl)azaniumyl]acetate (CAS No. 820-66-6)
- ethyl 2-phenylpropanoate (CAS No. 2510-99-8)

The following four substances remain on the PACs list and will be subject to continued quantitative monitoring:

- p-chloronitrobenzene (CAS No. 100-00-5)
- 1,2,4-benzenetricarboxylic acid 1,2-anhydride (CAS No. 552-30-7)
- disodium2,2'-vinylenebis[5-(4-morpholino-6-anilino-1,3,5-triazin-2-ylamino)benzenesulfonate] – also known as fluorescent-260 (CAS No. 16090-02-1)
- methyl (1H-1,3-benzimidazol-2-yl)carbamate, also known as carbendazim (CAS No. 10605-21-7)

As a general requirement under the CSCL, companies that manufacture or import any listed PACs in volumes of one tonne or more per year must submit annual reports to METI. METI may request additional toxicity or exposure data if further assessment is considered necessary. There are no penalties associated with this update.

Update to the mandatory environmental pollution prevention labeling requirements for perfluoro-hexanesulfonic acid-related substances (draft amendment)

The Ministry of Health, Labor, and Welfare, the Ministry of Economy, Trade, and Industry; and the Ministry of the Environment have opened a public consultation on a proposed amendment to update the mandatory environmental pollution prevention labeling requirements for products containing Class I Specified Chemical Substances. This initiative modifies the enforcement order of the Act on the Examination and Regulation of Manufacture, etc., of Chemical Substances to add newly designated perfluorohexanesulfonic acid (PFHxS; CAS No. 355-46-4) related substances to the existing regulatory framework. Consequently, specific products utilizing these substances, namely fire extinguishers, fire extinguishing agents for fire extinguishers, and foam extinguishing agents will now be legally required to clearly display pollution prevention measures on their containers, packaging, or invoices.

The technical labeling standards for these newly added substances will be identical to the requirements already established for products containing perfluorooctanesulfonic acid (PFOS), perfluorooctanoic acid (PFOA), and their related substances. The proposed amendment has been officially published (due date for comments was 30 April 2026). Following the consultation, the updated regulations are scheduled to enter into force on 17 June 2026.

More information can be found in Japanese in this announcement.

South Korea

Amendment to the hazard assessment results of chemical substances under K-REACH (in force)

The Chemical Substance Safety Agency has issued a partial amendment (can be found here in Korean) to the hazard assessment results of chemical substances under the Act on the Registration and Evaluation of Chemicals (K-REACH). This law establishes the framework for the registration, evaluation, and management of chemical substances to protect human health and the environment. The amendment reflects updates based on new hazard data and regulatory assessments.

The amendment modifies the annexes listing chemical substances subject to hazard evaluation. These annexes include Annex 1 (New chemical substances) and Annex 2 (Existing chemical substances). The update also introduces the following key changes:

- revision of multiple entries for new chemical substances, including updates to identification numbers and associated details
- updates to hazard assessment results for certain existing chemical substances
- addition of new existing chemical substances with newly assessed hazard classifications

These changes require companies to ensure alignment with updated hazard information, which may impact classification and labelling of substances, safety rata sheets, and risk management and compliance obligations under K-REACH.

The amendment entered into force on 10 March 2026 and applies immediately. Companies handling affected substances should ensure their compliance documentation reflects the updated hazard assessment results. Penalties for non-compliance are governed by K-REACH.

Amendment to the regulated quantities on certain hazardous chemicals (draft)

The National Institute of Chemical Safety proposed a draft administrative amendment to update the regulated quantity standards for seventy-three newly designated hazardous chemicals. The draft administrative notice proposes revisions to Annex 2 of its regulation, specifically adding new quantity standards for newly designated hazardous chemicals under sequence numbers 1485 to 1557. Furthermore, it updates Annex 2 for seven specific sequence numbers (1458, 1459, 1487, 1499, 1502, 1503, 1505) to incorporate standards for "low-diffusion" specific liquid or solid substances, applying a lower regulated quantity limit of 400 tons with no upper limit. Furthermore, Article 4 is revised to clarify the calculation methodology for applying these regulated quantities based on a facility's maximum holding amounts.

The draft administrative amendment was published on 31 March 2026, with a consultation that ended on 15 April 2026. More information can be found here in Korean.

Amendment to the notice on reporting of refrigerant sales and reporting of manufacture, import, and sales performance of specific substances (consultation)

The Ministry of Climate, Energy and Environment has launched a consultation on a draft amendment to the notice governing the reporting of refrigerant sales and the manufacture, import, and sales performance of specific substances. The amendment aims to align the notice with revisions to the Ozone Layer Protection Act and to reflect the detailed reporting matters linked to refrigerant sales reporting under the Clean Air Conservation Act and specific substances performance reporting under the Ozone Layer Protection Act.

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Proposed changes include the classification of hydrofluorocarbons (HFCs) as "climate and ecosystem change-causing substances" and their inclusion under "specific substances." As a result, HFCs would be subject to the performance reporting system (covering manufacture, import, and sales), replacing the existing requirement to report them separately as refrigerant sales to the Ministry of Climate, with HFCs included under specific substances and reported to the Ministry of Trade, Industry and Energy as specific substances performance reports.

More information can be found here in Korean.

Amendment to the regulation governing the designation of persistent organic pollutants and their specific exemptions (consultation)

On 19 March 2026, the Ministry of Climate, Energy and Environment launched a public consultation on proposed amendments to the regulation governing the designation of persistent organic pollutants (POPs) and their specific exemptions (comments were due on 8 April 2026). The revision aims to align South Korea's domestic regulatory framework with updates under the Stockholm Convention on POPs, particularly the addition of newly prohibited substances at the international level.

The amendment focuses on revisions to existing annexes within the regulation governing POPs. Specifically, it updates Annex 1, which defines the types (designation) of persistent organic pollutants subject to control and Annex 2, which lists POPs subject to handling prohibitions, restrictions, and specific exemptions. The changes involve i) modification of the list of designated POP substances in Annex 1, and ii) revision of the list of prohibited and restricted substances and their applicable exemptions in Annex 2.

Following the amendment, substances newly included under the Stockholm Convention will be incorporated into national law and subject to the amended domestic notification. This includes i) prohibition or restriction of the handling of listed POP substances, as applicable, and ii) application of specific exemptions where explicitly defined in Annex 2.

The proposed amendment ensures alignment of South Korea's POPs regulation with international obligations under the Stockholm Convention. The update will revise Annex 1 and Annex 2 to reflect newly listed substances and updated exemption provisions. There are no penalties associated with this update.

More information can be found here in Korean.

Taiwan

Amendment to the restrictions on the import of mercury-containing products (draft)

On 13 February 2026, the Ministry of Environment has launched a consultation on a draft amendment to the regulation restricting the import of mercury-containing products (comments were due on 14 April 2026). The amendment aims to strengthen domestic mercury controls and align with the Minamata Convention on Mercury. Proposed changes include expanding the list of prohibited products to cover additional categories such as certain fluorescent lamps, measuring instruments, and industrial equipment. The draft also introduces phased import bans for specific fluorescent lighting

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products from 2027 and 2028. Limited exemptions would remain available for essential use, including military applications, research, and cases where no suitable mercury-free alternatives exist, subject to prior approval.

More information can be found in Chinese in this notice in the National Gazette.

Vietnam

Regulations and guidance on the implementation of the Law on Chemicals and Decree No. 6/2026/ND-CP (in force)

The Ministry of Industry and Trade of Vietnam issued Circular No. 01/2026/TT-BCT to provide detailed regulations and guidance on the implementation of the Law on Chemicals and Decree No. 26/2026/ND-CP. The legislators' primary aim is to comprehensively manage chemical-related operations, standardize administrative licensing procedures, and regulate the presence of hazardous chemicals in commercial products and goods.

The regulation contains nineteen annexes that provide the mandatory templates for Chemical Safety Data Sheets, application forms, licenses, logbooks, and loss-prevention control plans. Additional annexes outline the criteria for chemical classification, data sharing formats for state management, and the specific list of hazardous substances requiring information disclosure.

Manufacturers, importers, distributors, and retailers operating in Vietnam must comply with updated, decentralized licensing procedures governed by Provincial People's Committees (for Group 2 chemicals) and the Department of Chemicals (for Group 1 and prohibited chemicals). Companies are required to classify their chemicals according to greenhouse gas guidelines (version 2 of 2007 onwards) and provide detailed safety data sheets for hazardous substances. From 1 January 2026, organizations trading in specially controlled chemicals must submit a purchase and sale control form within ten days of delivery via the national electronic identification and authentication platform. Furthermore, organizations must implement strict physical control plans to prevent chemical loss and continuously update their operational activities, inventory, and new chemical registrations in the specialized chemical database. Importers and manufacturers of specific consumer goods (such as electronics containing lead or cadmium, or industrial paints containing toluene) are now explicitly required to publicly disclose this hazardous chemical information.

The Circular entered into force on 17 January 2026, officially superseding previous regulations, including Circular No. 32/2017/TT-BCT and Circular No. 17/2022/TT-BCT. A specific deadline is set for organizations trading in specially controlled chemicals, which must submit digital purchase and sale control forms within ten days of delivery, starting from 1 January 2026. There are no penalties associated with this update.

More information can be found here in Vietnamese.

Administrative procedures for granting export and import licenses for chemicals requiring special control (in force)

The Department of Chemicals has issued a notice regarding the implementation of administrative procedures for granting export and import licenses for chemicals requiring special control. The notice refers to Clause 6, Article 14 of Decree No. 26/2026/ND-CP regarding guidance on the management of hazardous chemicals and chemicals in products and goods. The

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notice provides implementation guidance on the submission method for license applications, specifying the use of the National Public Service Portal.

Organizations and individuals applying for licenses to export or import chemicals requiring special control must submit application dossiers via the National Public Service Portal. The Department of Chemicals informs organizations and individuals to implement this submission method from 5 March 2026.

There are no new penalties associated with this update. More information can be found here in Vietnamese.

EUROPE

European Union

Amendment to Annex II to Regulation (EU) 2017/852 on mercury (in force)

On 17 March 2026, the European Commission published Delegated Regulation (EU) 2026/55 amending Annex II to Regulation (EU) 2017/852 on mercury. The amendment updates the European Union mercury rules to reflect Decision MC-5/4 adopted under the Minamata Convention on Mercury.

The amendment inserts a new entry 2a into Part A of Annex II covering very high accuracy capacitance and loss measurement bridges and high frequency radio frequency switches, and relays in monitoring and control instruments, where the maximum mercury content is 20 milligrams per bridge, switch or relay, except those used for research and development purposes. The inserted entry sets 31 December 2025 as the date from which the export, import, and manufacturing of those mercury-added products are prohibited. Recital 1 states that the prohibition does not apply to products essential for civil protection and military uses, and to products for research, calibration of instrumentation, or use as a reference standard.

Penalties are not mentioned in the update.

Calls for comments and evidence on bisphenols, copper and its inorganic compounds, endocrine disruptors, naphthalene, toluene, and certain lithium compounds (consultation)

On 1 April 2024, the European Chemicals Agency (ECHA) launched several calls for evidence with comments due on 1 July 2026.

Bisphenols
ECHA announced a call for evidence to evaluate occupational exposure limits for bisphenols relevant to occupational health. The objective is to assess workplace exposure to these substances and evaluate the option of establishing an airborne occupational exposure limit, alongside Short-Term Exposure Limits (STEL), Biological Limit Values (BLV), Biological

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Guidance Values (BGV), and specific notations. These evaluations support Directive 2004/37/EC to protect workers from carcinogenic, mutagenic, or reprotoxic risks. The target substances are:

- bisphenols: 4,4'-sulphonyldiphenol (BPS; EC No. 201-250-5, CAS No. 80-09-1)
- 4,4'-methylenediphenol (BPF; EC No. 210-65-2, CAS No. 620-92-8)
- 4,4'-[2,2,2-trifluoro-1-(trifluoromethyl)ethylidene]diphenol (BPAF; EC No. 216-036-7, CAS No. 1478-61-1)

To prepare its scientific report, ECHA is collecting new and existing scientific information regarding the substances' uses, exposure levels, health effects, toxicology, epidemiology, and modes of action. Companies handling these chemicals should note that BPS and BPAF have a harmonized classification as Repr. 1B. Industry stakeholders can submit either non-confidential or confidential information, provided any claims of confidentiality are accompanied by valid justification.

Copper and its inorganic compounds

ECHA opened a call for evidence regarding the scientific evaluation of occupational exposure limits for copper and its inorganic compounds. This scientific evaluation is used to support regulatory initiatives aimed at protecting workers from chemical risks, to be set pursuant to the primary governing legislation, the Chemical Agents Directive (Directive 98/24/EC). The objective is to evaluate workplace exposure and to assess the option of establishing an airborne occupational exposure limit, alongside other limit values such as STEL, BLV, BGV, and specific notations. The call for evidence outlines the target substance's identity as copper (EC No. 231-159-6, CAS No. 7440-50-8) and its inorganic compounds.

The agency is seeking contributions from target groups including industry, academia, European Union (EU) Member State Competent Authorities, non-government organizations, and trade associations. Evaluating authorities will pay particular attention to submitted data regarding the substance's uses, exposure levels, health effects, toxicology, epidemiology, and modes of action. Participants may submit either non-confidential or confidential information, provided any claims of confidentiality are accompanied by valid justification.

Endocrine disruptors

ECHA announced a call for comments and evidence to support the evaluation of whether endocrine disruptors (EDs) should be included within the scope of Directive 2004/37/EC on carcinogens, mutagens, or reprotoxic substances at work (CMRD). This initiative follows a mandate from the European Commission under Directive (EU) 2024/869 and aims to strengthen the protection of workers from hazardous chemical exposures. The call is part of ECHA's broader scientific assessment process and is not limited to a specific substance but instead focuses on a group of substances with endocrine-disrupting properties. It complements subsequent stages of evaluation, including the development of a scientific report that will inform potential regulatory amendments to the CMRD framework.

Stakeholders are invited to submit relevant scientific and technical information on endocrine disruptors, including data on exposure, toxicology, epidemiology, mechanisms of action, and health effects. The information gathered will be used to assess whether the inclusion of EDs within the scope of the CMRD is appropriate and necessary to address occupational health risks. The outcome will support the preparation of a scientific report that may inform future legislative changes at the EU level.

Naphthalene

ECHA launched a call for comments and evidence on naphthalene (EC No. 202-049-5, CAS No: 91-20-3) as part of its process for evaluating occupational exposure limits (OELs) under the Chemical Agents Directive (Directive 98/24/EC). This call represents an early-stage step in the preparation of a scientific report that will support the establishment of workplace exposure limits. The call forms part of ECHA's OEL development framework and complements the later consultation on the scientific report reviewed by the Committee for Risk Assessment (RAC). It aims to collect relevant scientific and technical data prior to formal assessment. The substance under evaluation is naphthalene, which is classified as Carc. 2 (i.e., suspected of causing cancer) and Acute Tox. 4 (i.e., harmful if swallowed or inhaled).

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Stakeholders are invited to submit information on uses, exposure scenarios, toxicology, epidemiology, health effects, and modes of action, as well as any other relevant scientific data. This information will be used by ECHA in preparing the scientific report that underpins RAC's opinion on appropriate exposure limits, including potential airborne OELs, STEL, BLV, and BGV.

Toluene

ECHA launched a call for comments and evidence on toluene (EC No. 203-625-9, CAS No: 108-88-3) as part of its process for evaluating OELs under Directive 98/24/EC. This call represents an early-stage engagement step in the development of a scientific report that will inform the setting of workplace exposure limits. The call is structured as part of ECHA's OEL evaluation framework and complements the subsequent consultation on the scientific report reviewed by RAC. It aims to gather relevant scientific and technical data prior to formal assessment. Toluene is classified as Repr. 2 (i.e., suspected of damaging the unborn child), STOT SE 3 (i.e., may cause drowsiness or dizziness), STOT RE 2 (i.e., target organ toxicity), and Skin Irrit. 2.

Stakeholders are invited to submit information on uses, exposure scenarios, toxicology, epidemiology, health effects, and modes of action, as well as any other relevant scientific data. This information will be used by ECHA in preparing the scientific report that underpins RAC's opinion on appropriate exposure limits, including potential airborne OELs, STEL, BLV, and BGV. The data collected will support future regulatory initiatives aimed at protecting workers from chemical risks in occupational settings.

Lithium compounds

ECHA launched a consultation on OELs for certain lithium compounds: lithium carbonate (EC No. 209-062-5; CAS No. 554-13-2), lithium chloride (EC No. 231-212-3, CAS No. 7447-41-8), and lithium hydroxide (EC No. 215-183-4, CAS No. 1310-65-2). The consultation forms part of the EU process for establishing workplace exposure limits, supporting scientific evaluation and regulatory decision-making. The consultation is based on an ECHA scientific report prepared for review by RAC. This report serves as the technical basis for RAC's opinion on appropriate exposure limits and is included as an annex to the committee's final opinion. The process is conducted under ECHA's OEL framework, which involves stakeholder consultation prior to the adoption of RAC opinions. The outcome will inform RAC's scientific opinion and potential future EU-level occupational exposure limit setting.

Harmonized classification and labelling consultations for sulphuryl difluoride and hydrochloric acid (consultation)

The European Chemicals Agency (ECHA) launched a public consultation on a proposal submitted by Austria for the harmonized classification and labelling (CLH) of sulphuryl difluoride (EC No. 220-281-5, CAS No. 2699-79-8) under the EU CLP Regulation (comments due on 18 May 2026). The proposal would update the existing Annex VI classification by introducing revised hazard classifications, including upgrading acute toxicity (inhalation) to Category 2, adding aquatic chronic toxicity classification, and refining target organ toxicity classifications affecting the nervous system, respiratory system, and kidneys. Stakeholders may submit scientific data and comments on hazard classifications and assessments, which will be evaluated by the Committee for Risk Assessment (RAC) prior to adoption of a final opinion.

ECHA also launched a public consultation on a proposal submitted by Latvia for the CLH of hydrochloric acid under the CLP Regulation (comments due on 18 May 2026) to invite stakeholders to comment on multiple hazard classes, including acute toxicity (oral and inhalation), skin corrosion, eye damage, and corrosivity to metals, as well as additional hazard classes open for review. The proposal would update the existing Annex VI classification by introducing new hazard classes and revised classifications, including Acute Toxicity Category 3 for oral and inhalation exposure, Skin Corrosion Category 1, Eye

Damage Category 1, and corrosivity to metals. The consultation allows stakeholders to provide scientific data, comments on classification decisions, and input on hazard assessments, which will be evaluated by RAC before adoption of a final opinion.

Proposal for European Union-wide restriction on per- and polyfluoroalkyl substances with targeted derogations (consultation)

The European Chemicals Agency (ECHA) has initiated a public consultation regarding a proposed restriction on per- and polyfluoroalkyl substances (PFAS). The proposal is based on concerns that PFAS are extremely persistent in the environment and that many are also associated with mobility, bioaccumulation, and ecotoxicological effects. Because they are used across a wide range of industrial, professional, and consumer applications and continue to be emitted, ECHA notes that their accumulation in the environment is effectively irreversible.

The proposed restriction option (referred to as Restriction Option 2) would ban the manufacture, placing on the market, and use of over 10,000 PFAS substances whether on their own, as constituents in other substances, in mixtures, or in articles above specific concentration limits. This restriction impacts manufacturers, importers, retailers, and distributors across numerous sectors, including textiles, electronics, food packaging, metal plating, cosmetics, and medical devices. To ease supply chain transitions, the proposal includes a general eighteen-month transition period upon entry into force, along with use-specific time-limited derogations lasting either five or twelve years based on the availability of alternatives. Furthermore, time-unlimited derogations are provided for PFAS used as active substances in plant protection products, biocidal products, and medicinal products (as these are managed under other regulations), and firefighting foams are entirely excluded from this specific scope. The public consultation for the draft opinion opened on 26 March 2026 and will close on 25 May 2026.

Poland

Amendment to the act on foreign trade in goods, technologies, and services, including the manufacturing of weapons and explosives (in force)

Poland published in its Journal of the Laws the Act of 13 March 2026 (can also be found here in Polish) that amends the existing Polish Act of 29 November 2000, governing foreign trade in goods, technologies, and services of strategic importance, as well as the manufacturing and trading of weapons and explosives. The update aligns Polish national law with European Union (EU) frameworks regarding trade controls and firearms specifications. Specifically, the amendment serves to apply Regulation (EU) 2021/821, which establishes an EU regime for controlling the export, brokering, technical assistance, transit, and transfer of dual-use items. Additionally, it implements Directive (EU) 2024/325 to establish new minimum marking depth requirements for firearms and their essential components.

The amendment introduces updated authorization requirements and electronic filing procedures for entities trading in strategic goods, dual-use items, and arms. Key changes include the following:

- newly defined validity periods for permits
  - individual arms trade permits are valid for up to one year, and global arms permits are valid for up to three years
  - for dual use items, individual and global permits are valid for up to two years (or up to four years for specific EU authorizations)
- import certificates will expire if not presented to foreign authorities within 12 months of issuance

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- establishment of a central IT register managed by the trade control authority to track granted authorizations, requiring entities to report any personal data changes within 14 days
- for the arms industry, mandating a new minimum marking depth of 0.0762 millimeters for firearms, though this does not apply retroactively to items placed on the market before this specific provision's entry into force
- for traders utilizing national or EU general authorizations, a requirement to submit annual reports by the end of the first quarter of the following year; arms exporters must submit reports by the end of April
- use of the Entrepreneur Information Point (PIP) system, for submitting applications, accessing register data, maintaining records, and receiving certain administrative decisions electronically
- For entities carrying out an export or intra-EU transfer of armaments, a requirement to submit an annual report by the end of April of the following year
- For applicants, retention of required trade documents, such as import certificates and end-user statements, for five years from the permit's issue date
- Requirement for any documents drawn up in a foreign language to be accompanied by a sworn Polish translation

The Act was published on 7 April 2026 and generally entered into force on 22 April 2026. There are specific exceptions for the dates of effect: Article 2 and Article 10 entered into force on 8 April 2026, while Article 1 item 17 letter b enters into force on 8 October 2026. Penalties for non-compliance include a fine, restriction of liberty, or imprisonment for up to two years for anyone who provides false or incomplete data or information in an application for an individual or global permit, an import certificate, or an end-user statement certification.

More information can be found here in Polish.

Amendment to the Environmental Protection Law and related legislation (draft)

Poland's Ministry of Climate and Environment has published a draft Act (can also be found here in Polish) amending the Environmental Protection Law of 27 April 2001 and related legislation to implement Directive (EU) 2024/1785 on industrial emissions. The Environmental Protection Law is the main framework governing environmental protection in Poland, and this amendment updates its provisions in line with EU requirements. The draft Act introduces new concepts and strengthens existing requirements applicable to industrial installations, including environmental performance levels, environmental management systems, and transformation planning.

The draft Act introduces several new obligations and stricter requirements for operators of industrial installations:

- Implementation of Best Available Techniques (BAT):
  - emission limits must reflect the lowest achievable levels
  - increased emphasis on environmental performance and efficiency
- Environmental Management Systems (EMS):
  - mandatory for operators of covered installations
  - must include environmental objectives, monitoring, and risk assessments
  - subject to periodic audits (at least every three years)
  - includes requirements for public access to certain information
- Transformation plans:
  - operators must prepare long-term plans covering the period 2030–2050
  - plans must address transition towards climate neutrality and circular economy objectives
- Stricter permitting requirements:
  - integrated permits must include detailed emission limits and monitoring conditions
  - authorities must assess impacts across air, water, and soil

- Resource efficiency and chemicals management:
  - includes provisions related to the management of hazardous substances
  - requires improved efficiency in the use of energy, water, and raw materials
- Limited derogations:
  - temporary exemptions may be granted only in exceptional circumstances (e.g., crises)
  - must be time-limited and not result in significant environmental pollution

The draft act is expected to enter into force on 1 July 2026. Penalties for non-compliance are set out under the existing Environmental Protection Law.

United Kingdom

Amendments to the Persistent Organic Pollutants Regulation 2026 (draft)

The Department for Environment, Food & Rural Affairs (Defra) published an open consultation on 18 March 2026 concerning the Amendments to the Persistent Organic Pollutants (POPs) Regulation 2026. This consultation seeks views on proposed changes to the assimilated POPs Regulation (EU) 2019/1021. The government is also looking for evidence regarding the potential implications of recent or upcoming amendments to the EU POPs Regulation, which applies in Northern Ireland, as well as the potential suitability of equivalent amendments being implemented in Great Britain (i.e., England, Scotland, and Wales).

The core focus of the consultation is to gather feedback on draft legislation to add five new POPs to the list of prohibited substances in Annex I. Specifically, this prohibition includes medium-chain chlorinated paraffins, UV-328 (EC No. 247-384-8, CAS No. 25973-55-1), Dechlorane Plus (EC No. 236-948-9, CAS No. 13560-89-9), chlorpyrifos (EC No. not available, CAS No. 2921-88-2), and long-chain perfluorocarboxylic acids (LC-PFCAs). Additionally, the consultation requests comments on proposed modifications to the existing entry for the already prohibited perfluorooctanesulfonic acid (PFOS; EC No. 217-179-8, CAS No. 1763-23-1) and the potential implications of recent EU amendments concerning polybrominated diphenyl ethers (PBDEs). Finally, it seeks input on evaluation processes, evidence generation, and engagement regarding substances considered as potential new POPs under the Stockholm Convention.

Reforms to the Packaging Waste Recycling Note and the Packaging Waste Export Recycling Note System (consultation)

The Department for Environment, Food & Rural Affairs (Defra) launched a public consultation on further proposed reforms to the Packaging Waste Recycling Note (PRN) and Packaging Waste Export Recycling Note (PERN) system. The PRN and PERN framework, initially established under the 1997 Producer Responsibility Obligations (Packaging Waste) Regulations, allows producers to fund recycling investments and demonstrate they have met statutory recycling targets through evidence notes. Following reforms introduced on 1 January 2026, this consultation introduces an additional package of industry-codesigned measures aimed at improving system integrity, levelling the playing field, and reducing fraud.

The proposed update introduces specific operational changes:

- standardizing the point in the recycling process where the recyclable proportion is consistently measured
- mandating the regular review, update, or withdrawal of national protocols and Agency Agreed Industry Grades
- cancelling illegitimately issued evidence notes to force greater due diligence during evidence purchasing

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Furthermore, it establishes an exceptional compliance mechanism for unavoidable market shortages of PRNs and PERNs and enhances data transparency by requiring trading platforms and brokers to register with regulators and report data. These regulatory adjustments will directly affect domestic re-processors, exporters, packaging producers, producer compliance schemes, the retail and manufacturing industries, and waste management companies. The public consultation opened on 24 March 2026, and the deadline for comments was 5 May 2026.

Two initiatives to upgrade product safety regulations (consultation)

The Department for Business and Trade (DBT) and the Office for Product Safety and Standards (OPSS) have opened two consultations for initiatives aiming to upgrade the United Kingdom's (UK's) product safety regulations. The first initiative proposes a "new, modernized and enhanced core product safety framework" to update the General Product Safety Regulations 2005, aiming to support a more consistent and streamlined product safety framework within a wider landscape of over 150 product safety and legal metrology laws, address the risks of modern online sales, and mandate proactive action from everyone in the supply chain. The second initiative seeks the "comprehensive reform" of the Furniture and Furnishings (Fire) (Safety) Regulations 1988 by replacing the mandatory open-flame "match test" with a smolder test, with the aim of maintaining a high level of fire safety while meaningfully reducing the use of chemical flame retardants.

The proposed framework introduces a product-level safety regime that would require a more holistic assessment of product safety, incentivize hazards and risks to be designed out of products, and introduce clearer responsibilities across the supply chain. For domestic upholstered furniture, the government is introducing a smolder test assessing a slow-burning ignition source which abandons a 2023 proposal for a "flame retardant technology hierarchy" that critics feared would not adequately reduce chemical usage. While this new testing aligns with voluntary European Union or United States approaches, the UK will retain distinct, sector-specific furniture regulations to allow for swift amendments based on new evidence and the potential introduction of specific labelling rules to support enforcement. Both consultations were published on 31 March 2026 with a deadline for comments on 23 June 2026.

NORTH AMERICA

Canada

Updates to the substance function codes and application codes (published)

The Canadian government has updated its substance function codes and application codes, formerly known as consumer and commercial codes, to align with internationally harmonized categories proposed by the Organization for Economic Co-operation and Development (OECD). These codes are routinely relied upon during information-gathering initiatives, including Section 71 data call-ins under the Canadian Environmental Protection Act and New Substances Notifications, to identify the purpose and role of chemicals in consumer or commercial settings. This administrative update aims to better support activities under the federal Chemicals Management Plan and enable more consistent data reporting by industry across different jurisdictions. To facilitate the transition to the new system, the government has published updated lists alongside side-by-side comparisons, referred to as "crosswalks", to show how the revised codes correspond to the previous system.

By incorporating the OECD's functional, product, and article use categories, the updated codes demand a higher level of detail when companies report on notified chemical substances. Specifically, the harmonized codes now capture granular information regarding a substance's method of application, such as whether it is sprayed or applied as a liquid, as well as specific areas of potential exposure. Additionally, the Canadian government introduced new codes and revised certain OECD-proposed categories to better reflect specific Canadian regulatory and market conditions. All industry participants, including manufacturers, importers, retailers, and distributors who are required to submit chemical data through Section 71 notices or New Substances Notifications, must adopt these revised codes to accurately report their substances' functions and applications.

The update was announced and officially published on 27 March 2026. There are no penalties associated with this update.

Delay of Phases 2 and 3 of the Federal Plastics Registry to 2027 (published)

Canada has delayed Phases 2 and 3 of its Federal Plastics Registry (FPR) reporting requirements to 2027. The FPR mandates annual reporting on plastic resins and products across the supply chain. While expanded reporting is postponed, Phase 1 obligations remain in effect for 2025 and 2026, covering packaging, electronics, and single-use plastics for the residential waste stream.

Penalties for non-compliance are governed by the Canadian Environmental Protection Act and may include fines or enforcement actions. A new Notice outlining 2027–2029 requirements is expected in Summer 2026, with a Notice of Intent in Winter 2026 to allow stakeholder input.

Ministerial Condition No. 22313 regarding phenol, methylstyrenated and amendments to the Federal Plastics Registry (in force)

On 14 March 2026, Canada published regulatory notices under the Canadian Environmental Protection Act, 1999 (CEPA), including Ministerial Condition No. 22313 and amendments to the Federal Plastics Registry. These measures strengthen Canada's management of both potentially hazardous substances and plastic reporting obligations.

Ministerial Condition No. 22313 concerns phenol, methylstyrenated (CAS No. 68512-30-1) and was issued after the Ministers of the Environment and Health concluded that the substance is suspected to be toxic or capable of becoming toxic within the meaning of Section 64 of CEPA. It entered into force on 19 February 2026. The ministerial condition imposes legally binding controls on the manufacture, import, use, transfer, disposal, and record-keeping associated with phenol, methylstyrenated as follows:

- the notifier may manufacture or import the substance only for use as a component in an adhesive applied either in a spray booth or enclosed area designed to capture overspray and collect all wastes, or for minor maintenance and repair purposes in quantities not exceeding 10 kilograms of adhesive per day per site; the notifier may transfer the substance only to a person who agrees to use it in accordance with these restrictions
- at least 120 days before beginning manufacture in Canada, the notifier must provide the Minister with specified information, including anticipated annual quantity, manufacturing site details, transportation and storage arrangements, anticipated releases, disposal methods, hazard data, and manufacturing process descriptions
- the measure requires controlled disposal of waste and containers, immediate response, and notification in the event of environmental release, written communication of the ministerial conditions to downstream recipients, and record retention for at least five years

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Canada amended the reporting obligations of plastic resins and certain plastic products for the Federal Plastics Registry for the 2025 and 2026 calendar years. The amendments were published and made available on 14 March 2026. An explanatory note states that these amendments reflect the postponement of phases 2 and 3 of the Registry. The amendments require persons to continue reporting for the 2025 and 2026 calendar years. This reporting applies to Schedule 1 Parts 1 to 3, as well as Category 1 (Electronic and Electrical Equipment) and Category 8 (Single-use or disposable products) under Part 4. Therefore, this amendment impacts producers of packaging, electronics and electrical equipment, and single-use and disposable plastics destined for the residential waste stream. Canada also published a notice of intent indicating that a new notice under section 46 of CEPA is expected to be issued to continue information-gathering activities for the 2027, 2028, and 2029 calendar years, with stakeholder consultation to follow.

No new penalties are associated with these updates.

Amendments to the Non-domestic Substances List (in force)

On 18 March 2026, the Department of the Environment, under the Canadian Environmental Protection Act, 1999, amended the Non-domestic Substances List (NDSL) through Order 2026-87-03-02. The NDSL identifies substances that are not manufactured or imported into Canada above specified threshold quantities but are known to be in international commerce. Substances on the NDSL are subject to notification and information requirements under the New Substances Notification Regulations, with reduced data requirements compared to substances not listed on the NDSL.
This update amends Part I of the NDSL by deleting alcohols, C11-15, ethoxylated, compds. with iodine (CAS No. 68439-47-4) and fatty acids, C18-unsatd., dimers, di-Me esters, hydrogenated (CAS No. 147853-32-5). It also amends Part II of the NDSL by deleting Entry 19637-5: phosphorane, pentahalo-, polymer with ammonium halide, P-carbomonocyclicoxy derivs. These substances were removed from the NDSL following their addition to the DSL.

The amendment came into force on 18 March 2026. From the effective date, the removed substances are no longer subject to the regulatory obligations associated with the NDSL. No penalties are specified in this update.

Guidelines to address chemicals used in rubber product manufacturing (effective)

On 4 April 2026, the Minister of the Environment issued Release Guidelines under the Canadian Environmental Protection Act, 1999 (CEPA) to address chemicals used in rubber product manufacturing (RPM). These chemicals have been assessed as toxic and pose risks when released into surface waters. The guidelines aim to reduce these risks by recommending concentration targets and outlining best practices for facilities that use the substances of concern:

- 1,4-benzenediamine, N,N'-mixed phenyl and tolyl derivatives (BENPAT; CAS: 68953-84-4)
- tetramethyl-thioperoxydicarbonic diamide ([(H2N)C(S)]2S2)) (TMTD; CAS: 137-26-8)

The Guidelines are organized into core sections supported by five appendices:

- Appendix 1 - Concentration Targets for Substances of Concern
- Appendix 2 - Declaration of the Operator
- Appendix 3 - Annual Evaluation Report
- Appendix 4 - Declaration of Sampling Reporting Exemption
- Appendix 5 - Analytical Methods

The guidelines are effective as of their publication date, 4 April 2026. Companies are encouraged to submit their Declaration of the Operator (Appendix 2) within six months of the publication or up to six months after they begin using the substances. Annual reports (Appendix 3) are due by 1 June following each calendar year of operation.

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There are no penalties associated with this update, as these guidelines are voluntary; however, failure to prevent the release of these substances in harmful quantities could still lead to enforcement actions under CEPA or the Fisheries Act.

United States

Reporting deadline extension for the Health and Safety Data Reporting Rule under Toxic Substances Control Act Section 8(d) (consultation)

On 30 March 2026, the U.S. Environmental Protection Agency (EPA) published a proposed rule to extend the reporting deadline under the Health and Safety Data Reporting Rule issued under Section 8(d) of the Toxic Substances Control Act. The rule requires manufacturers and importers to submit unpublished health and safety studies and related records for sixteen listed chemical substances.

The EPA is proposing to extend the current reporting deadline from 22 May 2026 to 21 May 2027. The extension is intended to provide additional time while the agency considers potential modifications to the underlying reporting requirements and to reduce compliance burden and avoid inconsistent or duplicative reporting obligations. The proposal is not final and is open for public comment before a final decision is made.

EPA extends compliance dates for perchloroethylene and carbon tetrachloride (proposal)

The U.S. Environmental Protection Agency (EPA) proposed on 27 March 2026 to extend certain compliance dates within the final risk management rules for perchloroethylene (PCE: CAS No. 127-18-4) and carbon tetrachloride (CTC; 56-23-5) under the Toxic Substances Control Act (TSCA). This proposed extension aims to align the compliance timelines of non-federal entities with those of federal agencies and their contractors under the Workplace Chemical Protection Program, providing regulatory relief while the EPA works to revise the rules to ensure they are durable, enforceable, and practical. The underlying determination that PCE and CTC present an unreasonable risk to human health and the environment is not being revisited, and the timeline adjustment is not intended to weaken existing worker protections.

In response to stakeholder feedback that the original deadlines were unworkable and could lead to incomplete or rushed compliance, the update extends some Workplace Chemical Protection Program compliance dates for non-federal entities to align with the timelines given to federal agencies and their contractors. This change creates a level playing field for all facilities transitioning to the new standards. The update primarily affects commercial manufacturers and industrial users who utilize PCE as a solvent for metal degreasing and manufacturing processes, or CTC as a raw material for producing refrigerants, chlorinated compounds, and agricultural products.

The proposed rule was published in the Federal Register on 27 March 2026, and comments must be submitted by 27 April 2026 under docket EPA-HQ-OPPT-2026-0992. The EPA also intends to publish proposed rules to amend various other aspects of these regulations in or around summer 2026. The current deadlines will remain in effect until they are officially modified through this rulemaking.

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House Bill 8016 to phase out production of nonessential uses and to prohibit the release of per- and polyfluoroalkyl substances (proposal)

On 19 March 2026, House Bill 8016 (HB 8016) was introduced in the 119th United States Congress to address risks associated with per- and polyfluoroalkyl substances (PFAS). The initiative reflects growing regulatory attention toward limiting PFAS exposure and aligns with broader efforts to manage these substances due to concerns regarding human health and environmental impact. The bill proposes a phase-out of production of non-essential uses of PFAS and a prohibition on releases of PFAS.

House Bill 8016 represents an early-stage legislative proposal targeting PFAS production and environmental releases. The bill has been introduced and referred to committees for further consideration, with no adoption timeline currently defined, and proposes enforcement provisions that may include civil penalties, fines, imprisonment for up to five years, or both for certain violations.

The State of New Mexico approves labeling of per- and polyfluoroalkyl substances in consumer products (published)

The New Mexico Environmental Improvement Board (EIB) has adopted a final administrative rule to implement the state's per- and polyfluoroalkyl substances (PFAS) Protection Act. The main regulation was signed into law in 2025 to tackle the adverse public health and environmental effects of "forever chemicals," which are linked to serious health conditions including cancer. The legislators' and regulators' aim with this new rule is to establish a framework that requires manufacturers to identify products containing intentionally added PFAS so consumers can make informed purchasing decisions.

The rule introduces universal labeling requirements for consumer products manufactured with intentionally added PFAS, mandating that they display an Erlenmeyer (conical) flask symbol containing the word "PFAS". For "complex durable goods" defined as products with a useful life of at least five years comprising 100 or more components, the label must be included in consumer-facing specification sheets and operation or maintenance manuals rather than on the product itself. These new rules apply directly to manufacturers and place no obligations or compliance burdens on retailers or consumers. Following industry feedback, the rule applies only to products manufactured after the labeling requirements take effect, rather than to all products sold in the state after that time.

The labeling requirements will officially enter into effect on 1 January 2027. Concurrently, the state's phased sales prohibitions on products containing intentionally added PFAS will begin taking effect: cookware, food packaging, and toys are banned in 2027, followed by furniture and carpets in 2028. By 2032, all remaining non-exempt products will be prohibited from sale. There are no penalties associated with this update.

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OCEANIA

Australia

Proposed Industrial Chemicals Environmental Management Standard (consultation)

The Australian Department of Climate Change, Energy, the Environment, and Water (DCCEEW) has initiated a public consultation on proposed Industrial Chemicals Environmental Management Standard (IChEMs) for fourteen classes of industrial chemicals, one variation to an existing standard (UV-328; CAS No. 25973-55-1), and the addition of CAS numbers to the existing standard for perfluorooctanesulfonic acid (PFOS; CAS No. 1763-23-1). The aim of IChEMS is to manage the environmental risks of these chemicals and make it easier for industry to select less harmful alternatives. These standards apply exclusively to the environmental impacts of industrial uses; they do not manage human health risks, nor do they regulate medical or agricultural uses.

The chemicals and chemical groups included in this proposed update are:

- perfluoroheptanesulfonic acid (PFHpS; CAS No. 375-92-8) and related substances
- perfluorononanesulfonic acid (PFNS; CAS No. 68259-12-1), perfluorodecanesulfonic acid (PFDSl CAS No. 335-77-3) and related substances
- 2,4,6-Tri-tert-butylphenol (CAS No. 732-26-3)
- perfluorobutanesulfonic acid (PFBS; CAS No. 375-73-5) and related substances
- perfluoroheptanoic acid (PFHpA; CAS No. 375-85-9) and related substances
- perfluoropentanesulfonic acid (PFPeS; CAS No. 2706-91-4) and related substances
- *6:2 fluorotelomer sulfonamides
- butylated hydroxytoluene (BHT; CAS No. 128-37-0)
- butylated hydroxyanisole (CAS No. 25013-16-5) and related antioxidants
- tetrabromobisphenol A (CAS No. 79-94-7)
- perfluorobutanoic acid (PFBA; CAS No. 375-22-4), perfluoropentanoic acid (PFPeA; CAS No. 2706-90-3), perfluorohexanoic acid (PFHxA; CAS No. 307-24-4) and related substances
- limonene (CAS No. 138-86-3)
- fatty acids
- glycerides
- proposed variation: phenol, 2-(2H-benzotriazol-2-yl)-4,6-bis(1,1-dimethylpropyl)- (UV-328)
- additional CAS numbers to an existing standard: PFOS and related substances.

New Zealand

Restrictions for chlorpyrifos, medium chain chlorinated paraffins, and long chain perfluorocarboxylic acids (consultation)

The Environmental Protection Authority (EPA) of New Zealand is consulting on a proposal to restrict three persistent organic pollutants (POPs) – chlorpyrifos (CAS No. 2921-88-2), medium chain chlorinated paraffins (MCCPs), and Long chain

perfluorocarboxylic acids (LC-PFCAs). In May 2025, these highly toxic, slow-degrading chemicals were added to the Stockholm Convention on POPs. To fulfill its international obligations under this convention, New Zealand legislators aim to restrict these chemicals domestically by amending Schedules 1AA and 2A of the overarching Hazardous Substances and New Organisms Act 1996 (HSNO Act).

This proposal introduces restrictions for chlorpyrifos, MCCPs, and LC-PFCAs, directly impacting manufacturers, importers, and parts suppliers across the agricultural, plastics, electronics, defense, and automotive sectors. To ease supply chain disruptions, the proposal includes standard-specific exemptions allowing continued use in applications like flexible PVC, adhesives, and semiconductors until 16 December 2031 alongside extended exemptions for metalworking fluids (until 2036) and certain replacement parts (until 2041). Additionally, "articles in use" exemptions will permit existing manufactured equipment in New Zealand that contains MCCPs and LC-PFCAs to be legally used until the end of their service life.

The deadline for public submissions is 17 April 2026. Under the requirements of the Stockholm Convention, the changes must be fully adopted into the HSNO Act and enter into force by 16 December 2026.

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