

Newsletter

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

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 8 – 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.

SUBSCRIPTION SERVICE

IAEG also offers a subscription service to receive these newsletters once they become available for release. To subscribe click [here](#).

IAEG Work Group 9 provides this newsletter with support from  and 

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 8 – 2026*



TABLE OF CONTENTS



GLOBAL..... 5

Key standard development updates from Greenhouse Gas Protocol (announcement)..... 5

Updates to ISSB digital sustainability taxonomy (proposal)..... 5



ASIA..... 6

China 6

Updates to the chemical registration system (consultation) 6

Addition of 482 substances to the Inventory of Existing Chemical Substances in China (in force)..... 7

Japan 7

Updated Fiscal Year 2026 schedules for small-quantity and low-production-volume new chemical
substance applications (consultation) 7

Singapore..... 8

Sustainability disclosure standards (consultation) 8

South Korea..... 8

Hazards and risks for seventy-four new chemical substances manufactured or imported during second
quarter of 2026 (published)..... 8

Amendments to K-REACH to distinguish between hazard assessments conducted under Articles 18 and 19
(draft) 9

Administrative amendment to Regulations on the Prescribed Quantity of Hazardous Chemicals (draft) 9

Taiwan 10

Revision to the measure “Listing of PFAS and their Operational Management” (proposal) 10

Designation of 269 per- and polyfluoroalkyl substances as concerned chemical substances (draft)..... 11

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 8 – 2026*



Announcement to the Categories and Management of Handling for Concerned Chemical Substances to list six chemicals as substances of concern (draft)	12
--	----



EUROPE..... 13

European Union13

The Digital Product Passport Registry is now live (announced)	13
Establishment of technical and operational arrangements for the Digital Product Passport Registry (in force).....	13
Ten guidance documents to support implementation of the Carbon Border Adjustment Mechanism (published)	14
Implementation updates to the European Union Deforestation Regulation (published).....	15
Revisions to the European Union Emissions Trading System (draft)	15
Packaging and packaging waste: rules on national registers of producers (draft).....	16
Harmonized end-of-waste criteria for plastic waste (draft).....	16
Amendments to the European Union RoHS Directive regarding exemptions for lead and cadmium in certain electrical and electronic equipment (draft).....	18
Delegated regulation to establish rules for purchasing and repurchasing Carbon Border Adjustment Mechanism certificates (draft).....	18

Hungary19

Amendments to rules on waste (in force).....	19
--	----

Poland.....20

Amendments on requirements regarding the restriction of hazardous substances in electrical and electronic equipment (in force)	20
--	----

Switzerland20

Amendments to Regulations on Packaging and Ordinance on the Prevention and Disposal of Waste (in force).....	20
--	----

United Kingdom.....21

Final Risk Assessment Opinion regarding proposed restrictions on per- and polyfluoroalkyl substances in firefighting foam (consultation)	21
Addition of nine substances of very high concern (SVHCs) to the UK REACH Candidate List (consultation).....	22

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 8 – 2026



NORTH AMERICA 22

Canada.....22

Ministerial Condition No. 22460 regarding cyclohexanecarboxamide, N-[2-[(ethylsulfonyl)amino]-5-(trifluoromethyl)-3-pyridinyl]-, sodium salt (in force) 22

Six orders to amend the Non-domestic Substances List and the Domestic Substances List (in force) 23

Addition of 2,4-pentanedione to the Watch List (published) 24

United States.....25

Draft risk evaluations for o-dichlorobenzene, p-dichlorobenzene, ethylene dibromide, and 1,1,2-trichloroethane (draft) 25



OCEANIA 26

Australia.....26

Modifications to requirements regarding occupational exposure to lead (consultation) 26



SOUTH AMERICA..... 27

Brazil.....27

Brazilian RoHS: Restrictions on hazardous substances in electronic and electrical equipment (in force)..... 27

Law to establish the maximum permitted limit of lead in paints and similar surface coating materials (published) 28

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 8 – 2026*



GLOBAL

Key standard development updates from Greenhouse Gas Protocol (announcement)

On 29 July 2026, the Greenhouse Gas Protocol (GHG Protocol) announced several [standard development updates](#) affecting its corporate GHG accounting standards. The announcement states that GHG Protocol and the International Organization for Standardization (ISO) will combine their corporate carbon accounting standards into a single harmonized global accounting standard, with an integrated public consultation on the future corporate standard planned for Q2 2027.

The consolidation is expected to bring together GHG Protocol's Scope 1, Scope 2, Scope 3, and Actions and Market Instruments (AMI) standards with ISO 14064-1. GHG Protocol also published results from its Scope 2 consultation and released preliminary feedback from the AMI standard development process.

Corporate emissions accounting standards are often used to support sustainability disclosures, customer reporting, target-setting, and assurance preparation. Companies with complex operations and multi-tier supply chains may see future implications for Scope 2 electricity accounting, Scope 3 value-chain emissions, and reporting of market instruments or climate-related actions. Because the announcement relates to standards development rather than a binding regulation, it does not establish immediate legal obligations or penalties; however, it signals continued movement toward greater interoperability and consistency in corporate greenhouse gas accounting expectations.

Updates to ISSB digital sustainability taxonomy (proposal)

On 29 July 2026, the International Sustainability Standards Board (ISSB) published a [proposed update to the IFRS¹ Sustainability Disclosure Taxonomy](#) to reflect targeted amendments to IFRS S2 Climate-related Disclosures that were issued in December 2025. The proposed update is intended to ensure that sustainability-related financial disclosures prepared in accordance with ISSB Standards can continue to be digitally tagged and reported in a consistent and machine-readable format.

The proposal reflects reliefs and clarifications previously introduced for greenhouse gas emissions disclosures. The ISSB notes that the taxonomy update does not introduce new disclosure requirements and does not affect compliance with ISSB Standards. Instead, it supports digital reporting by enabling investors and other users to more efficiently search, compare, extract, and analyze sustainability-related information. Comments on the proposal are due by 28 September 2026.

¹ IFRS = International Financial Reporting Standards.



ASIA

China

Updates to the chemical registration system (consultation)

The Ministry of Ecology and Environment (MEE) [notified](#) the World Trade Organization (WTO) of the draft regulation “Measures on the Environmental Management Registration of New Chemical Substances (Revised Draft for Comments)” to update China’s new chemical registration system to align with the Ecological and Environmental Code. This regulation would apply to the registration, tracking, and supervision of new chemical substances manufactured or imported into China. Under Articles 42 and 43, the regulation explicitly exempts radioactive chemicals, chemicals stored only in customs supervision zones and exported without processing, and substances used for scientific research, testing, or monitoring. Non-manufacturing activities, such as trade, warehousing, and transportation, are also exempt from the definition of use.

There are various obligations outlined in the draft regulation. Manufacturers and importers must obtain an Environmental Management Registration Certificate before producing or importing new chemical substances (Article 4). Also, applicants must be legally registered and capable of independently assuming legal responsibility in the territory of China (Article 10). Article 10 outlines two types of registrations: Simplified Registration applies to an annual production or import volume under one tonne, and routine registration applies to an annual production or import volume of one tonne or more.

Existing registration certificates obtained under the earlier systems, Ministry Order No. 7 and MEE Order No. 12, will continue to be valid unless any of the information or matters specified on the existing registration certificate changes (Article 44). This will void the certificate and require re-registration under the new system. The MEE has clarified that registration under the MEE Order No. 12 ends on 15 August 2026 even though the new regulation was still open for comments until 30 August 2026.

Existing self-declared registration filings (MEE Order No. 12) previously available, as follows, will now require mandatory registration by 31 December 2026 (Article 45): annual tonnage under 1 tonne per year, polymers containing < 2 % of new chemical monomers or reactants, or polymers of low concern (a.k.a. PLC).

The following are testing and application requirements:

- » routine registration requires physicochemical, health toxicology, and ecotoxicology test data; ecotoxicology reports must include data using test organisms from the People's Republic of China (Article 11), and organizations must comply with Good Laboratory Practices (Article 15)
- » applications with a cumulative national volume under ten tonnes are exempt from submitting a pollution risk assessment report and socioeconomic benefit analysis (Article 11)
- » low-concern polymers, or polymers containing no more than 2% monomers or reactants, are exempt from submitting physicochemical/toxicological test reports, risk assessment reports, and socioeconomic benefit analyses, provided they submit proof of polymer status (Article 11)

Manufacturers, importers, and downstream industrial users must implement pollution risk control measures (Article 32), maintain activity records and upload annual reports to the national information system by 31 March each year (Article 35), and immediately report newly discovered hazard characteristics or pollution risks and take mitigation measures (Article 35).

Downstream users must request compliance information from their suppliers (Article 31) while suppliers must clearly convey the registration certificate details to downstream users. This information must be explicitly stated in sales, consignment, or other downstream contracts, and must include registration certificate number, registered uses and other pollution risk control measures, and environmental management requirements specified on the certificate

This regulation would replace MEE Order No. 12. Comments were due on 30 August 2026.

Addition of 482 substances to the Inventory of Existing Chemical Substances in China (in force)

On 4 August 2026, China's Ministry of Ecology and Environment (MEE) published Announcement No. 40 of 2026, adding 486 substances to the Inventory of Existing Chemical Substances in China. These comprise four substances meeting the applicable requirements under 2026 Batch 1 (14th batch overall) and 482 registered new chemical substances under 2026 Batch 1 (16th batch overall). As a result, the substances are treated as existing chemicals and are generally no longer subject to new chemical registration or filing solely because of their inventory status. However, the list of 482 substances specifies new-use environmental management scopes for certain substances, and the relevant controls continue to apply.

To support implementation of the Ecological and Environmental Code of the People's Republic of China, the MEE General Office issued Notice Huan Ban Gu Ti Han [2026] No. 301, effective from 15 August 2026. From that date, the MEE will cease handling environmental management filings for new chemical substances. Enterprises and institutions meeting the filing requirements under MEE Order No. 12 must instead submit an environmental management registration application before manufacture or import. Applications must include the registration application form, documentation demonstrating the applicable circumstances under Article 10(3), and environmental and health hazard and environmental risk information already in the applicant's possession. Applications will be accepted and approved by reference to the simplified registration procedures and timelines. The notice will automatically expire when the MEE introduces replacement provisions governing new chemical substance registration.

More information can be found in Chinese here in this [announcement](#) from MEE and in [Notice No. 301](#).

Japan

Updated Fiscal Year 2026 schedules for small-quantity and low-production-volume new chemical substance applications (consultation)

On 30 June 2026, Japan's Ministry of Health, Labor, and Welfare (MHLW), Ministry of Economy, Trade, and Industry, and Ministry of the Environment (MOE) published revised FY2026 application schedules for manufacturers and importers seeking confirmation for [small-quantity new chemical substances](#) (can also be found [here](#) in Japanese) under Article 3(1)(v) and [low-production-volume new chemical substances](#) (can also be found [here](#) in Japanese) under Article 5(4) of the Chemical Substances Control Law.

As of 1 September 2026, the remaining low-production-volume application windows are:

- » Round 6: 13–19 October 2026
- » Round 7: 13–19 November 2026
- » Round 8: 11–17 December 2026
- » Round 9: 18–22 January 2027

Low-production-volume applications may be submitted electronically through e-Gov, by optical disk to METI or on paper to METI. Confirmation notices are expected to be dispatched approximately one month after each application window closes.

The remaining small-quantity application windows are:

- » Round 5: 14–28 September 2026, electronic applications only; confirmation expected around 6 November 2026
- » Round 6: 20–30 October 2026, electronic applications only; confirmation expected around 9 December 2026
- » Round 7: 24 November–4 December 2026 for electronic applications and 24 November–2 December 2026 for optical-disk or paper applications; confirmation expected around 19 January 2027 – optical disks must be sent to METI, while paper applications must be sent to MOE.

Following migration of the electronic application system, applicant codes can no longer be used, and electronic applicants must use a GBizID prime or GBizID member account. A prime account requires Digital Agency review and cannot normally be created on the same day, although a member account can be created immediately where the business already holds a prime account. Application-system version 7.03 is mandatory for small-quantity electronic and optical-disk applications and low-production-volume electronic applications; submissions prepared using version 7.02 or earlier will not be accepted. Electronic submission one to two days before the deadline is recommended to reduce the risk of unexpected communication problems. Manufacture or import may, in principle, begin only after receipt of the confirmation notice.

Singapore

Sustainability disclosure standards (consultation)

On 27 July 2026, the Accounting and Corporate Regulatory Authority (ACRA)'s Interim Sustainability Standards Committee launched a [public consultation](#) on draft Singapore Sustainability Disclosure Standards. The draft standards are based on the International Sustainability Standards Board standards, with Singapore-specific adjustments. ACRA proposes two standards: Singapore Financial Reporting Standards (SFRS) S1 for general sustainability-related financial information, based on IFRS S1; and SFRS S2 for climate-related disclosures, based on IFRS S2. Under Singapore's climate-first approach, SFRS S2 would be mandatory while SFRS S1 would remain voluntary.

The draft standards may be relevant to climate-related governance, strategy, risk management, metrics, and greenhouse gas emissions disclosure. The proposal also includes Singapore-specific transition reliefs, an explicit and unreserved statement of compliance with SFRS S2, and ongoing relief for Scope 3 greenhouse gas emissions where companies are not subject to mandatory Scope 3 reporting. Because this is a public consultation, the draft standards do not yet establish finalized legal obligations or penalties, but they indicate the expected direction of Singapore's climate reporting framework.

South Korea

Hazards and risks for seventy-four new chemical substances manufactured or imported during second quarter of 2026 (published)

On 30 June 2026, the Ministry of Employment and Labor (MEL) published information on seventy-four new chemical substances manufactured or imported during the second quarter of 2026 through Public Notice No. 2026-337. The [publication](#) (can also be found [here](#) in Korean) provides the substance's names, identified hazards, annual manufacture or import quantity bands, and measures for preventing harm to workers.

Under Article 108 of the Occupational Safety and Health Act, a person intending to manufacture or import a new chemical substance must submit a hazard and risk investigation report to the Ministry at least 30 days before manufacture or import. Where the manufacture or import quantity is below one tonne, the report must be submitted at least fourteen days in advance. The MEL and the Korea Occupational Safety and Health Agency review the submitted information, notify the relevant manufacturers and importers of appropriate worker-protection measures, and publish the results.

Hazards were identified for forty-three of the seventy-four substances, including acute toxicity, skin corrosion, serious eye damage, skin sensitization, specific target organ toxicity, flammability, water reactivity, and aquatic hazards. The notified measures include appropriate respiratory protection, protective gloves and eye protection, local exhaust ventilation, and worker training. The classifications are based on the submitted toxicity information and available chemical databases, and the notice acknowledges that additional testing may identify further hazards.

Amendments to K-REACH to distinguish between hazard assessments conducted under Articles 18 and 19 (draft)

On 10 July 2026, the National Institute of Chemical Safety published an administrative advance notice proposing amendments to the Notification on the Results of Chemical Hazard Reviews under the Act on Registration, Evaluation, etc. of Chemicals, commonly known as K-REACH (comments were due on 30 July 2026). The proposal would reorganize the notification to distinguish hazard reviews conducted under Article 18 of K-REACH from hazard assessments conducted under Article 19. The existing annex would become Annex 1 for hazard review results, while a new Annex 2 would be introduced for hazard assessment results.

Under Annex 1, the draft would add hazard review results for seventy-eight existing chemicals and revise six existing chemical entries to reflect newly obtained hazard information. Six entries for new chemicals would also be revised, including corrections to previously published information. Annex 2 would publish six hazard assessment results for notified new chemicals identified as being of concern. The published information would include the chemical name and CAS number, whether the substance is designated as acutely or chronically hazardous to human health or as ecologically hazardous, and its principal hazard characteristics.

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

Administrative amendment to Regulations on the Prescribed Quantity of Hazardous Chemicals (draft)

On 29 July 2026, the National Institute of Chemical Safety published Public Notice No. 2026-77, which proposes an administrative amendment to the Regulations on the Prescribed Quantity of Hazardous Chemicals. The draft amendment establishes new threshold handling quantities for thirty-eight newly designated hazardous substances and refines or corrects regulatory entries for five existing hazardous substances. These threshold quantities determine whether facilities storing or handling these chemicals must comply with specific statutory requirements under the Chemical Control Act (CCA) Enforcement Rules. The comment period for this draft amendment ran from 29 July 2026 until 19 August 2026. This update impacts Annex 2 of the Regulations on the Prescribed Quantity of Hazardous Chemicals.

This regulation applies to any business operator or facility in South Korea that manufactures, imports, uses, stores, distributes, or otherwise handles any of the thirty-eight newly designated hazardous substances or the five corrected existing hazardous substances, specifically targeting those operators whose on-site storage or daily handling volumes exceed the newly established or modified prescribed quantity thresholds.

The newly designated substances are assigned new statutory handling thresholds. For the existing chemical entries, the amendment covers minor additions, spelling corrections, and threshold value modifications resulting from updated hazard classifications.

Section 2 of the draft notice:

- » sets out specific calculation frameworks to determine the prescribed quantities for the newly designated hazardous substances, applying standard hazard-group-based calculation percentages
- » establishes low-diffusion thresholds for new substances, tightening lowest-tier limits only for those belonging to Skin Corrosion Hazard Group 1
- » refines the technical phrasing used to calculate the maximum inventory of substances held on-site to ensure consistent threshold assessments

These updated handling thresholds serve as triggers for obligations under the CCA Enforcement Rules. Facilities storing or handling these substances above the specified thresholds must prepare to comply with the accident prevention, facility safety, self-inspection, and licensing requirements set forth under Articles 19, 23, 27, and 29 of the Enforcement Rules. Violations are subject to the existing CCA Enforcement Rules.

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

Taiwan

Revision to the measure “Listing of PFAS and their Operational Management” (proposal)

The Ministry of Environment and Chemicals Administration (ChA) proposed major revisions to the draft measure "Listing of PFAS and their Operational Management"² under the Toxic and Concerned Chemical Substances Control Act (TCCSCA). The ChA revised the draft proposal to delay implementation to 2027 and narrow the regulated substances. The revised draft regulation classifies regulated substances into two annexes and establishes a transitional compliance timeline:

- » Appendix 1 lists 112 non-polymer substances, including perfluoroalkyl acids and their precursors
- » Appendix 2 lists 70 PFAS polymers
- » Appendix 3 outlines the deadlines and transitional procedures for operators

The updated draft eases industry compliance by increasing thresholds and simplifying labeling requirements.

- » Concentration Threshold: The control concentration limit increases from 0.1% to 1% by weight for all listed substances
- » Labeling: Packaging and containers at or above 1% only require a single supplementary label: "per- and polyfluoroalkyl substances" – this replaces the previous four category-specific labels
- » Appendix 1 Obligations: Manufacturing, importing, selling, storing, or using these non-polymer substances at or above 1% concentration requires operational approval, monthly recordkeeping, quarterly reporting, site labelling, and Safety Data Sheet (SDS) preparation.
- » Appendix 2 Obligations:
 - only manufacturing and importing are regulated
 - products containing 30% or more polymer content trigger full TCCSCA obligations
 - products between 1% and 30% only require the supplementary PFAS label
 - downstream use, storage, sale, and disposal of these polymers are completely out of scope

² PFAS = per- and polyfluoroalkyl substances.

The public consultation period closed on 30 June 2026, and the final measure is expected to be published in Q4 2026. The regulations will enter into force on 1 January 2027. Operators must begin recording and reporting activities from an effective date, with the first quarterly reporting deadline on 10 April 2027. Operators have a two-year transition period until 1 January 2029 to complete packaging labeling, prepare SDSs, and obtain approval documents.

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

Designation of 269 per- and polyfluoroalkyl substances as concerned chemical substances (draft)

Taiwan's Ministry of Environment (MoE) proposed designating 269 per- and polyfluoroalkyl substances as concerned chemical substances under the Toxic and Concerned Chemical Substances Control Act. The proposal would establish a control concentration of 0.1% by weight and divide the substances into three categories: 126 perfluoroalkyl acids, precursors and other PFAS compounds; 113 polymers; and 30 gases. Substance identification would be based on the CAS number, with the Chinese and English names provided only for reference.

For perfluoroalkyl acids, precursors, and other PFAS compounds at or above 0.1%, manufacturers, importers, sellers, users and storage operators would be required to obtain approval documents, maintain monthly records, submit quarterly reports, label containers and packaging, and provide safety data sheets. PFAS polymers and gases at concentrations of at least 0.1% but below 30% would only be subject to container and outer-packaging labeling. Depending on the substance, labels would identify the material as a fluoropolymer, perfluoropolyether, fluorinated gas or hydrofluoroolefin. Other activities within this concentration range would not be controlled under the Act. Manufacture or import of listed PFAS polymers or gases at concentrations of 30% or more would require approval documents, monthly records, quarterly reporting, container and packaging labels, and safety data sheets. For these categories, manufacture includes compounding, processing and synthesis.

Uses for testing, research, education, and analytical purposes would be exempt from control under the Act. Substances or articles already controlled under the sectoral legislation specified in the draft would also fall outside these requirements. Operators would nevertheless be required to manage listed PFAS appropriately to prevent losses or releases into the environment.

The draft proposed that existing operators begin maintaining records and submitting periodic reports from 1 January 2026. They would have until 1 January 2027 to obtain the required approval documents and complete container, packaging, operational-site and facility labeling and safety data sheet requirements. Other requirements would apply from the proposed effective date.

The MoE announcement refers to a two-year grace period. However, Annex 4 establishes 1 January 2027 as the proposed compliance deadline, one year after the proposed effective date of 1 January 2026. The supplied sources do not provide a final notice resolving this discrepancy.

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

Announcement to the Categories and Management of Handling for Concerned Chemical Substances to list six chemicals as substances of concern (draft)

On 20 July 2026, the Taiwan Ministry of the Environment published a [draft amendment](#) to the "Categories and Management of Handling for Concerned Chemical Substances" (can also be found [here](#) in Chinese). The amendment lists six new chemicals as substances of concern, establishing concentration control thresholds, warning labels, transaction tracking, and compliance deadlines (comments due on 18 September 2026). This update applies to manufacturers, importers, distributors, and downstream users handling any of the six newly designated substances in concentrations at or above the proposed regulatory thresholds:

- » toluidine red (CAS No. 2425-85-6) - 30% weight/weight (wt/wt) or above
- » para red (CAS No. 6410-10-2) - 30% wt/wt or above
- » bisphenol B (CAS No. 77-40-7) - 1% wt/wt or above
- » bisphenol F (CAS No. 620-92-8) - 1% wt/wt or above
- » (2-methyl-4-(methylthio)-2-morpholinopropiophenone) (MMMP) (CAS No. 71868-10-5) - 90% wt/wt or above
- » gamma-butyrolactone (GBL) (CAS No. 96-48-0) - 20% wt/wt or above

Authorizations and Permits

Any entity engaged in the manufacture, import, sale, use, or storage of the six substances above concentration thresholds must obtain official administrative approval documents from the Ministry of Environment before operating.

Labeling, Packaging, and Safety Data Sheets (SDSs)

All manufacturers, importers, and distributors must maintain SDSs and apply Chinese warning labels to containers, packaging, and facility premises. The following specific container markings and concentration rules apply:

- » MMMP & GBL: Must be clearly marked with "限工業用" (For industrial use only)
- » toluidine red & para red: Must be clearly marked with "禁止用於食品及飼料" (Prohibited in food and feed).

GBL mixtures with concentrations at or above 20% but below 90% wt/wt must comply with the container labeling and SDS rules but are otherwise exempt from other Toxic and Concerned Chemical Substances Control Act (TCCSCA) operational requirements. GBL concentrations at or above 90% wt/wt must comply with all provisions under the Act.

Operational Recording and Reporting

For the six substances that are proposed for addition, all handlers must maintain transaction-by-transaction recording. Monthly reports of these records must be submitted to the local authorities.

Distribution Restrictions

Operators are strictly prohibited from selling these six chemical substances through online platforms or other channels where the identities of the buyer and seller cannot be verified.

Transitional Compliance Timeline (Appendix 4)

To facilitate compliance, the draft establishes a phased transition timeline for existing operators:

- » commence detailed operational record-keeping and regular monthly reporting by 1 January 2027
- » complete container labeling, prepare and maintain Safety Data Sheets (SDSs), and obtain official administrative approval documents (permits) for all handling operations (manufacture, import, sale, use, storage) by 1 July 2028.

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 8 – 2026*



EUROPE

European Union

The Digital Product Passport Registry is now live (announced)

On 20 July 2026, the European Commission launched the [Digital Product Passport](#) (DPP) Registry and accompanying testing environment, marking a significant implementation milestone under the Ecodesign for Sustainable Products Regulation (ESPR) (EU) 2024/1781. The DPP is intended to improve product transparency by providing access to information related to sustainability, circularity, compliance, and product characteristics throughout the value chain. While product data remains decentralized and hosted by economic operators, each DPP must be registered within the central Registry using a unique product identifier and associated metadata. The Registry establishes the infrastructure necessary to support future Digital Product Passport requirements across multiple product categories.

For the aerospace and defense sector, the Registry is relevant through supply chains that may include products subject to future DPP requirements, such as batteries, electronics, steel, aluminum, ICT products, and certain energy-related products. The launch of the Registry does not itself create immediate product-specific compliance obligations; rather, it provides the digital infrastructure that will support future delegated acts and sector-specific implementation measures. Organizations supplying products into the European Union market may wish to monitor upcoming DPP requirements and assess whether product data management, traceability, and supplier information practices can support future registration and reporting expectations.

Establishment of technical and operational arrangements for the Digital Product Passport Registry (in force)

On 17 July 2026, the European Commission published [Commission Implementing Regulation \(EU\) 2026/1778](#), establishing the technical and operational arrangements for the European Union's Digital Product Passport (DPP) Registry. The Regulation entered into force on 6 August 2026. The Registry supports DPPs required under delegated acts adopted pursuant to the Ecodesign for Sustainable Products Regulation and under other European Union (EU) legislation covering certain batteries, construction products, toys, detergents, and end-user surfactants. It will also apply to products covered by future EU legislation requiring DPP and registration in the Registry. The Implementing Regulation does not make DPPs mandatory for all products in these categories, as the applicable products, information requirements, registration level, and compliance dates are determined by the relevant product-specific legislation.

The Registry is managed by the European Commission and includes a secure user interface, an application programming interface, a verification platform, a system for generating unique registration identifiers, a storage component, a list of verified DPP service providers, a semantic repository, and an audit log system. It stores registration information such as unique identifiers, relevant commodity codes, references to DPP service providers, and registrant information rather than operating as a central repository for all passport content.

Economic operators and, where permitted by applicable EU legislation, value chain actors such as repairers, refurbishers, remanufacturers, and recyclers must complete an identity verification process before performing actions in the Registry. Verification may involve qualified electronic signatures or seals, high-assurance electronic identification, or electronic attestations of attributes, depending on the type and establishment of the actor. Verified status remains valid until the relevant electronic identification means expires or for a maximum of three years, whichever occurs first. Once verification expires, the actor cannot register new DPPs or modify Registry data until the verification process is repeated. DPPs must be registered at the model, batch or item level specified by the applicable EU legislation. Where different EU rules require different registration levels for the same product, registration must occur at the most granular level required.

For products covered by delegated acts adopted under the Ecodesign for Sustainable Products Regulation, item-level passports must be linked to the corresponding batch and model identifiers where those designs exist. Batch-level passports must similarly be linked to the corresponding model identifier where a model design exists.

The Commission will automatically check submitted DPP data for semantic conformity, required registration information, the applicable level of granularity, and, where relevant, commodity codes and links to backup copies held by DPP service providers. These automated checks do not verify the substantive accuracy of the passport information or constitute proof of product compliance.

Verified economic operators must ensure that submitted information remains accurate, complete, and up to date and must implement appropriate technical and organizational measures to protect their IT systems and Registry credentials. Where permitted by applicable EU legislation, registration activities may be delegated to a third party that has completed the verification process, but the economic operator remains fully responsible for compliance. Registered DPPs may also be transferred to another verified economic operator or, where applicable, a verified value chain actor that assumes the related obligations. Economic operators may generate secure electronic proof of registration for one or more DPPs. The document remains available for download for 90 calendar days from its generation and may subsequently be regenerated. Unless applicable EU legislation specifies another availability period, DPP registration data will be automatically deleted 10 years after registration.

The Commission must maintain a semantic repository containing common data models, semantic definitions, vocabulary, and multilingual labels. Access to the repository, its search service and its publicly documented Application Programming Interfaces must be provided free of charge. The Commission must also maintain an audit trail of Registry activity. Access and authentication logs must be retained for six months, administrative and data-exchange logs for five years, and data-modification logs for the duration of the relevant registration. Users who become aware of suspected malicious behavior involving the Registry must immediately inform the Commission and, where appropriate, the Member States concerned. Member States must appoint a designated national administrator by 18 February 2027 to manage access rights for their competent national and customs authorities.

Ten guidance documents to support implementation of the Carbon Border Adjustment Mechanism (published)

On 14 August 2026, the European Commission published a [series of ten guidance documents](#) to support implementation of the Carbon Border Adjustment Mechanism (CBAM) during its definitive period. The guidance is intended for non-European Union producers of CBAM-covered goods, authorized CBAM declarants, and verifiers and provides practical information regarding emissions monitoring, reporting, embedded emissions calculations, verification activities, use of default values, and free allocation adjustments. The package includes four general guidance documents and six sector-specific guides covering cement, hydrogen, fertilizers, iron and steel, aluminum, and electricity. The guidance does not establish new legal

requirements but is intended to support compliance with existing obligations under the CBAM Regulation and related secondary legislation.

Implementation updates to the European Union Deforestation Regulation (published)

On 13 July 2026 the European Commission adopted [two measures amending the European Union Deforestation Regulation](#) (EUDR), Regulation (EU) 2023/1115. A Delegated Act updates and simplifies Annex I — removing six product groups, adding three, and introducing new exemptions — while an Implementing Act, published as Commission Implementing Regulation (EU) 2026/1565, sets the technical rules for the EUDR Information System used to submit due-diligence statements and simplified declarations. The only new obligation date created by this update is 30 December 2027 for the newly added products. These measures build on the December 2025 legislative amendment and complete the simplification package presented in May 2026.

Products removed from scope include cattle hides, skins and leather; re-treaded tires; soybeans for sowing; articles of vulcanized rubber; conveyor and transmission belts; and aircraft and motor-vehicle seats. Products added to scope include soluble coffee; certain palm-oil derivatives; and frozen cattle tongues.

New exemptions include samples and products used for analysis, examination and testing are removed from scope, with targeted exemptions for waste, used and second-hand products, packing material, and products used to manufacture medicinal products. The seven covered commodities (cattle, cocoa, coffee, palm oil, rubber, soy, wood) are unchanged — only the list of derived products in Annex I is updated.

The Implementing Act (Regulation (EU) 2026/1565) entered into force on 17 July 2026. The Delegated Act has been adopted but is not yet in force; it is subject to a two-month scrutiny period by the European Parliament and the Council before entering into application in December 2026.

Revisions to the European Union Emissions Trading System (draft)

On 17 July 2026, the European Commission proposed a [targeted revision of the European Union Emissions Trading System](#) (EU ETS) to strengthen Europe's industrial competitiveness and support delivery of the EU's 2040 climate target. The EU ETS is a cap-and-trade system under which companies pay for greenhouse gas emissions, creating an incentive to reduce emissions in a cost-effective way. The system has applied to power generation and energy-intensive industries since 2005, was extended to aviation in 2012, and to maritime transport in 2024. The Commission states that the system is now under review to provide a clear, predictable path for businesses while supporting clean investment and competitiveness.

For the aerospace and defense sector, the proposal is relevant through direct and indirect exposure to aviation, energy-intensive manufacturing, maritime logistics, covered facilities, and industrial supply chains subject to carbon pricing. Potential implications may include changes to allowance costs, free allocation rules, emissions cap trajectory, and reporting or market exposure for covered activities. Because the proposal remains under the EU legislative process, it does not yet create final new obligations beyond the existing EU ETS regime, and further compliance consequences will depend on the adopted text and implementing measures.

Packaging and packaging waste: rules on national registers of producers (draft)

On 6 August 2026, the European Commission released a [draft implementing regulation](#) establishing standardized formats for registering in and reporting to national registers of packaging producers, detailing the reporting formats for packaging waste collected, recovered, or recycled. This draft act specifies standard electronic data fields and reporting formats for producers, aiming to streamline extended producer responsibility (EPR) compliance and prevent fragmented national systems.

This draft regulation applies to packaging producers (including manufacturers, importers, and distributors making packaging available for the first time) and their authorized representatives. It covers all packaging and composite packaging materials, including glass, paper, metal, plastics, wood, cork, textiles, and ceramics, along with single-use beverage containers and plastic carrier bags.

The draft regulation establishes technical rules for packaging producers:

- » Electronic Submission: Information must be submitted electronically via a data processing system that allows for a fully automated process and supports bulk verification of producers' registration numbers and digital certificates certifying compliance with EPR obligations
- » Predominant Material Reporting: Packaging placed on the market must be reported based on its predominant material by weight, and any separable packaging components must be reported as distinct items
- » Data Alignment: All reported data must align with the technical documentation established under Annex VII of Regulation (EU) 2025/40 or an equivalent complete description

Producers placing under ten tonnes of packaging on the market per year benefit from simplified reporting, they must still comply with the general registration requirements, as there is not de minimis registration threshold. Where a Member State has separate systems for packaging waste management (such as household vs. industrial), producers who place packaging on the market and participate in more than one system must register separately for the packaging covered by each system.

The public consultation was open until 10 September 2026. Once the final act is officially adopted and published, the regulation will enter into force on the twentieth day following its publication. There are no penalties specified in this update.

Harmonized end-of-waste criteria for plastic waste (draft)

On 6 August 2026, the European Commission [notified a draft Implementing regulation](#) under Directive 2008/98/EC establishing harmonized European Union (EU)-wide end-of-waste criteria for plastic waste. The draft rules define when recycled thermoplastic polymers cease to be waste, introducing physical purity limits, mandatory Quality Management Systems (QMS), and electronic Statements of Conformity for recyclers and importers.

Under Article 1 and Article 2(2), the regulation applies to all discarded thermoplastic polymers and blends of thermoplastic polymers, regardless of the polymer type or the source of the waste. The following are given as common examples:

- » polyethylene (PE)
- » polyethylene terephthalate (PET)
- » polypropylene (PP)
- » polystyrene (PS)
- » polyvinyl chloride (PVC)

The scope applies directly to the following market actors and waste streams:

- » producers (recyclers) who treat plastic waste so that it ceases to be waste (Article 2(9) and Article 3(1))
- » importers placing plastic recyclates on the EU market (Article 2(10) and Article 3(1))
- » imported plastic recyclates, which must meet equivalent requirements verified by a licensed third-country conformity assessment body (Article 5(8))
- » plastic waste from waste electrical and electronic equipment (WEEE) and end of life vehicles (ELVs), requiring recyclers to record compliance documentation from the previous treatment operator (Annex I, Section 1.1)
- » Food-contact recyclates, which must separately comply with Regulation (EC) No 1935/2004 and Regulation (EU) 2022/1616 before market placement (Recital 5)

The regulation explicitly excludes the following inputs and operations (Articles 1, 2; Annex I):

- » hazardous waste, unless contaminants are removed (Annex I, Section 1.1)
- » healthcare waste, unless non-hazardous and separately collected (Annex I, Section 1.2)
- » used hygiene products, unless decontaminated and sanitized (Annex I, Section 1.2)
- » preliminary sorting, visual checking, and other chemical recycling processes (such as chemical depolymerization into monomers) that do not retain the polymer chains (Recitals 6, 12)
- » forming final plastic products or components (Recital 4, Annex I)
- » Output plastic destined for energy recovery, fuel, or backfilling (Recital 4)

Recyclers must process thermoplastic waste using mechanical or solvent-based recycling that preserves polymer chain integrity. The regulation establishes the following technical obligations:

- » Compliance – recyclers must ensure the recycled plastic complies with REACH (Regulation (EC) No 1907/2006) authorization and restriction thresholds, CLP (Regulation (EC) No 1272/2008), and persistent organic pollutants controls under Regulation (EU) 2019/1021
- » Product Quality – recyclers must limit foreign materials in the final output plastic to less than 1.9% of moisture-free weight. For exports outside the EU, the consignment must contain only a single thermoplastic polymer.
- » Quality Management System (QMS) – producers must implement a QMS and arrange for an accredited conformity assessment body or environmental verifier to audit it every three years
- » Statements of Conformity – producers or importers must issue an electronic Statement of Conformity for each consignment.
- » Importer Obligations – under Article 5(8), third-country importers must ensure suppliers implement a QMS complying with Article 5(1)-(3), verified triennially by an EU Member State-accredited body; under Article 5(9), failure to meet these QMS requirements automatically classifies the imported plastic as waste by operation of law, forcing full compliance with the transboundary shipment controls of Regulation (EU) 2024/1157
- » Hazardous Substance Testing – quantify hazardous substances by analyzing representative samples of the output plastic; testing must occur every six months, with the exact frequency adjusted based on a risk assessment of historical composition data and input material variability
- » Foreign Material Testing – measure the content and nature of foreign materials gravimetrically by weighing samples under moisture-free conditions; sampling must occur at least once every six months and staff may use complementary analytical techniques, such as chromatography or infrared spectroscopy, for inspection
- » WEEE and ELV Documentation – if using waste from WEEE or ELVs, the operator must request documentation from the previous operator demonstrating compliance with the relevant treatment requirements. Recyclers must record this documentation in the QMS
- » Under Article 5(6), NACE codes 20, 22, and 38 define the mandatory accreditation scopes required for the external environmental verifiers who audit the recycler's QMS.

Public comment for the draft regulation is open until 20 September 2026. The regulation will enter into force on the twentieth day following its publication, with its requirements becoming applicable from the first day of the month following

a six-month transition period. If an importer fails to verify a supplier's QMS, the output plastic to be imported is automatically considered waste and, therefore, must comply with the shipment controls under Regulation (EU) 2024/1157.

Amendments to the European Union RoHS Directive regarding exemptions for lead and cadmium in certain electrical and electronic equipment (draft)

On 8 July 2026, the European Commission published a [draft delegated directive](#) amending Annexes III and IV to the European Union Restriction of Hazardous Substances (a.k.a. EU RoHS) Directive regarding exemptions for lead (CAS No. 7439-92-1) and cadmium (CAS No. 7440-43-9) in certain electrical and electronic equipment (EEE). Comments were due on 5 August 2026. The draft would renew, narrow, reorganize or discontinue exemptions covering applications such as fluorescent lamp glass, optical and filter glasses, reflectance standards, ceramic multilayer capacitors, laser equipment, oxygen sensors and superconducting medical and scientific equipment.

The proposed exemptions would expire 12, 18, 30, 54, or 78 months after the directive enters into force, depending on the application and EEE category. Examples include 30 months for lead in white optical glasses, 12 or 30 months for filter glass and reflectance standard applications, 18 or 54 months for specified capacitor soldering applications, and up to 78 months for certain oxygen sensors and superconducting applications. Existing exemptions covered by timely renewal applications remain valid until the Commission adopts a decision. If adopted, the directive would enter into force twenty days after publication in the Official Journal, with Member States required to transpose it within six months.

Delegated regulation to establish rules for purchasing and repurchasing Carbon Border Adjustment Mechanism certificates (draft)

On 9 July 2026, the European Union published a [draft delegated regulation](#) to establish detailed rules for purchasing and repurchasing Carbon Border Adjustment Mechanism (CBAM) certificates through a common central platform (comments were due on 6 August 2026). It defines how the platform operates alongside the CBAM Registry, sets payment and fee requirements, establishes reporting and data management rules, and specifies the responsibilities of authorized CBAM declarants, Member States, competent authorities, and the Commission. The regulation is divided into nine chapters:

- » Chapter I – General provisions (definitions)
- » Chapter II – Sale and repurchase of CBAM certificates
- » Chapter III – Common central platform
- » Chapter IV – Payment on the common central platform
- » Chapter V – Costs of the common central platform and fees
- » Chapter VI – Exchange of information and reporting
- » Chapter VII – Obligations of the contracting authorities and competent authorities
- » Chapter VIII – Data protection requirements
- » Chapter IX – Final provisions

Authorized CBAM declarants

Under Articles 2–5, authorized CBAM declarants must:

- » purchase CBAM certificates by submitting purchase requests through the CBAM Registry before payment is made via the common central platform
- » submit purchase requests for between 1 and 99,999 certificates; requests cannot be amended after submission and may only be withdrawn before payment (Article 2)
- » submit one repurchase request per year; requests submitted following a review of a CBAM declaration do not count towards this limit (Article 4)

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 8 – 2026*



- » meet the eligibility conditions for repurchase, including complying with annual certificate
- » surrender obligations where applicable (Article 4)
- » make all payments in euro (Article 13)

Fees

Under Articles 14–15:

- » a fee of €0.05 per CBAM certificate applies to certificate purchases
- » no fee applies to certificate repurchases

Competent authorities

Under Article 19, competent authorities must:

- » approve eligible repurchase requests
- » designate nominated bank accounts for certificate sales and repurchases
- » ensure sufficient funds are available for approved repurchases

Common central platform

Under Chapters III–VI, the common central platform must:

- » process certificate purchase and repurchase payments
- » exchange information with the CBAM Registry
- » maintain transaction records and reports
- » provide user support and monitor operations

The Regulation applies from 1 February 2027. Article 6, covering procurement of the common central platform, applies from the day after the Regulation enters into force (Article 26).

The draft regulation introduces operational requirements for the purchase and repurchase of CBAM certificates and establishes the governance, payment, reporting, and fee framework for the common central platform. No penalties or enforcement provisions are introduced by this draft. Decisions relating to purchase and repurchase requests are subject to remedies before national courts (Article 24).

[Hungary](#)

Amendments to rules on waste (in force)

[Government Decree 98/2026](#) and [Ministerial Decree 1/2026](#) (both available in Hungarian) amend Hungarian rules governing transboundary waste shipments, waste-management permits and registrations, waste electrical and electronic equipment, waste facilities and reporting, end-of-life vehicles, plastic products, and the national List of Waste. Ministerial Decree 1/2026 implements Commission Delegated Decision (EU) 2025/934 by introducing or revising codes for lead-acid, lithium, nickel, zinc, sodium, alkaline, mixed and other battery waste, together with waste from battery manufacture and recycling, including slag and intermediate treatment fractions.

The principal compliance changes include:

- » from 30 June 2026, notifications and reporting for imports, exports and transit of yellow-listed waste must be conducted electronically through the European Commission’s Digital Waste Shipment System (DIWASS) - green-listed waste remains subject to the existing national reporting procedure until 31 December 2026 and becomes subject to DIWASS from 1 January 2027

- » from 12 August 2026, applications for waste-management permits to fulfil packaging extended producer responsibility obligations must include expanded information on expected packaging quantities, planned waste collection, committed collection rates, collection and treatment arrangements, relevant contracts and permits, self-monitoring, and financial responsibility
- » from 1 July 2026, beverage cups not covered by Annex 1 to Government Decree 301/2021 may not be placed on the market if they contain more than 10% plastic by weight – relevant paper beverage cups containing no more than 10% plastic by weight may therefore remain on the market
- » operators holding affected waste-management permits or registrations must submit any amendments required to reflect the revised waste codes by 31 August 2026 - facility operators whose operating regulations require corresponding changes must apply for approval by the same deadline

The amendments enter into force in stages between 30 June 2026 and 1 January 2027. If an operator fails to submit a required permit or registration amendment by 31 August 2026, the waste-management authority will delete the affected waste codes, descriptions and related provisions with effect from 9 December 2026. The operator will consequently no longer be authorized to manage the affected waste under that permit or registration.

Poland

Amendments on requirements regarding the restriction of hazardous substances in electrical and electronic equipment (in force)

The Minister of Finance and Economy issued an [ordinance](#) on 30 June 2026 (can also be found [here](#) in Polish), amending the Regulation of 21 December 2016 on essential requirements concerning the restriction of hazardous substances (RoHS) in electrical and electronic equipment (EEE). The amendment replaces footnotes 2 and 4 of the 2016 regulation to include references to three 2025 Commission Delegated Directives concerning lead exemptions under Directive 2011/65/EU.

The consolidated 2016 regulation already provides that its substance concentration limits do not apply in the cases specified in Annexes III and IV to Directive 2011/65/EU. The three delegated directives amend Annex III and were all adopted on 8 September 2025:

- » Directive (EU) 2025/1802, concerning lead in high melting temperature solders
- » Directive (EU) 2025/2363, concerning lead in glass or ceramic components
- » Directive (EU) 2025/2364, concerning lead as an alloying element in steel, aluminum and copper

The ordinance does not reproduce the detailed technical conditions, equipment categories, or expiry dates of the affected exemptions. These remain specified in Annex III to Directive 2011/65/EU, as amended. The ordinance entered into force on 1 July 2026 and does not introduce or amend penalty provisions.

Switzerland

Amendments to Regulations on Packaging and Ordinance on the Prevention and Disposal of Waste (in force)

The Swiss Federal Council published [amendments](#) (available in German) to its Regulation on Packaging (VerpV) and the Ordinance on the Prevention and Disposal of Waste (VVEA), which aim to promote the circular economy and strengthen

recycling throughout Switzerland. There are requirements outlined for various stakeholders. Manufacturers are required to do the following to comply with new rules:

- » ensure packaging is designed to be as recyclable as possible
- » increase the use of recycled materials in packaging
- » support achievement of minimum recycling rates of 55% for plastic packaging, and 70% for beverage cartons
- » avoid unnecessary packaging and substances of very high concern (SVHCs) by 2030
- » pay a disposal fee on all glass packaging used for food and cosmetic products from 1 January 2028 (this is extended from what products currently require a disposal fee)
- » where applicable, provide separate collection systems for disposable plastic packaging and beverage cartons – this obligation only applies where, for two consecutive business years the company has cumulated annual turnover exceeding CHF 1 million and places more than 500 kilograms of plastic packaging and beverage cartons on the Swiss market

Importers must do the following to comply:

- » ensure imported packaging complies with Swiss recyclability and packaging requirements
- » verify that packaging contributes to meeting applicable recycling targets
- » review packaging composition to identify and phase out unnecessary packaging and SVHCs by 2030
- » participate in applicable collection, recycling, and financing arrangements associated with packaging placed on the Swiss market
- » pay a disposal fee on all glass packaging used for food and cosmetic products from 1 January 2028 (this is extended from what products currently require a disposal fee)

Distributors must do the following to comply:

- » offer separate collection services where the turnover and market-placement thresholds are exceeded for two consecutive years
- » support the collection and recycling of packaging waste through approved schemes
- » ensure packaging supplied to the Swiss market complies with applicable Packaging Ordinance requirements
- » contribute to packaging waste management financing where required

The VVEA amendments will come into force on 1 August, while changes to the VerpV will apply from 1 January 2027. Penalties for non-compliance include fines in accordance with the Environmental Protection Act.

United Kingdom

Final Risk Assessment Opinion regarding proposed restrictions on per- and polyfluoroalkyl substances in firefighting foam (consultation)

On 10 July 2026, Health and Safety Executive (HSE) announced the publication of its [final Risk Assessment Opinion](#) and the opening of a [public consultation](#) on the draft Socioeconomic Assessment Opinion concerning a proposed restriction on per- and polyfluoroalkyl substances (PFAS) in firefighting foams. The proposal follows the six-month consultation on the Annex XV restriction report, which ran from 18 August 2025 to 18 February 2026. After considering the consultation responses and advice from the REACH Independent Scientific Expert Pool, HSE concluded that restricting the placing on the market and use of PFAS in firefighting foams is an appropriate measure for reducing the identified risks to the environment and to human health through the environment. The final Risk Assessment Opinion is included in the Agency Opinion and is not subject to further consultation.

HSE sought comments on the draft Socioeconomic Assessment Opinion through a 60-day public consultation. The consultation, which closed on 7 September 2026, was limited to socioeconomic factors, and comments on the risk assessment, particularly Sections 2.1 and 4.1 of the Agency Opinion, will not be considered.

Addition of nine substances of very high concern (SVHCs) to the UK REACH Candidate List (consultation)

On 10 July 2026, the Health and Safety Executive (HSE) opened a six-week consultation on [proposals to add nine substances or substance groups](#) (scroll down one page on the link) to the United Kingdom (UK) REACH Candidate List of substances of very high concern (SVHCs). Stakeholders were invited to submit information on the identity and hazardous properties of the substances before HSE reaches a decision. Comments were due on 20 August 2026.

The consultation consists of individual consultation pages for each of the proposed nine SVHC.

- » medium-chain chlorinated paraffins (CAS No. 85535-85-9)
- » 1,1'-[ethane-1,2-diylbis(oxy)]bis[2,4,6-tribromobenzene] (CAS No. 37853-59-1)
- » bis(4-chlorophenyl) sulphone (CAS No. 80-07-9)
- » 2-tert-butyl-6-(5-chloro-2H-benzotriazol-2-yl)-4-methylphenol (CAS No. 3896-11-5)
- » oligomerization and alkylation reaction products of 2-phenylpropene and phenol
- » reaction mass of triphenylthiophosphate and tertiary butylated phenyl derivatives
- » O,O,O-triphenyl phosphorothioate (CAS No. 325726-84-9)
- » perfluoroheptanoic acid (CAS No. 375-85-9) and its salts
- » 4,4'-[2,2,2-trifluoro-1-(trifluoromethyl)ethylidene]diphenol (CAS No. 1478-61-1) and its salts

Stakeholders were asked to submit comments and scientific information on substance identity, hazardous properties, and the proposed identification of each substance as an SVHC. No new legal obligations apply during the consultation period. If any of the substances are subsequently added to the UK REACH Candidate List, separate obligations may apply under UK REACH.



NORTH AMERICA

[Canada](#)

Ministerial Condition No. 22460 regarding cyclohexanecarboxamide, N-[2-[(ethylsulfonyl)amino]-5-(trifluoromethyl)-3-pyridinyl]-, sodium salt (in force)

On 11 July 2026, the Department of the Environment published [Ministerial Condition No. 22460](#), issued under paragraph 84(1)(a) of the Canadian Environmental Protection Act, 1999 (CEPA). The condition concerns cyclohexanecarboxamide, N-[2-[(ethylsulfonyl)amino]-5-(trifluoromethyl)-3-pyridinyl]-, sodium salt (CAS No. 141284-73-3) and came into force on 30 June 2026.

Following an assessment, the Minister of the Environment and the Minister of Health suspect that the substance is toxic or capable of becoming toxic within the meaning of Section 64 of CEPA. The condition permits the notifier, defined as the person who submitted the prescribed information on 22 June 2026, to manufacture or import the substance subject to specified requirements. At least 120 days before beginning to manufacture the substance in Canada, the notifier must inform the Minister of the Environment in writing and provide information on the proposed manufacturing activity, anticipated quantities, the manufacturing facility, potential exposure and environmental releases, and available hazard and test data. If the substance or waste containing it is released into the environment, the notifier must immediately take measures to prevent further release and limit its dispersion. The relevant enforcement officer or emergency services must also be notified as soon as possible.

Before transferring the substance to another person, the notifier must inform the recipient in writing of the conditions and obtain written confirmation that the recipient agrees to comply. The notifier must also maintain records of relevant activities, quantities, and recipients for at least five years.

Six orders to amend the Non-domestic Substances List and the Domestic Substances List (in force)

[Order 2026-87-08-02](#) amends Part I of the Non-domestic Substances List (NDSL) under the Canadian Environmental Protection Act, 1999 (CEPA). The amendment removes CAS No. 26401-35-4³ from the NDSL because the substance has been added to the Domestic Substances List (DSL) under Order 2026-87-08-01. The Order is made under subsection 87(5) of CEPA. This is an administrative amendment to Canada's chemical inventories and does not introduce new restrictions, labeling requirements, or reporting obligations.

The Order contains two sections. Section 1, Amendment, removes CAS No. 26401-35-4 from Part I of the NDSL. Section 2, Coming into Force, specifies that the Order comes into force on the same day that subsection 1(1) of Order 2026-87-08-01 amending the DSL comes into force. The Order does not establish penalties, fines or fees. Existing compliance and enforcement provisions under the Canadian Environmental Protection Act, 1999 continue to apply where relevant.

The NDSL is an inventory of chemicals and polymers that are found in international commerce but are not used commercially in Canada above the trigger quantities specified in the New Substances Notification Regulations (Chemicals and Polymers). Substances on the NDSL are considered new to Canada and remain subject to notification requirements, although fewer information requirements apply than for new substances that are not listed on the NDSL.

The DSL provides an inventory of substances in the Canadian marketplace. Following their addition, the two substances are no longer considered new to Canada and are no longer subject to the general notification requirements under subsection 81(1) of the Act. However, their Significant New Activity (SNAc) requirements remain in place because the assessment identified potential human health concerns if the substances are used in consumer products or cosmetics that may result in repeated or prolonged dermal, oral, inhalation or incidental ingestion exposure of the public.

[Order 2026-87-08-01](#), issued under subsections 87(3) and 87(5) and paragraph 87(4.1)(a) of CEPA adds hexanedioic acid, 1,6-diisotridecyl ester (CAS No. 26401-35-4) and alkanedioic acid, di-branched alkyl ester (CAN 19814-2; CAS No. not available) to the DSL while maintaining the SNAc requirements previously applied through SNAc Notices No. 22262 and No. 22263/22318. From 30 June 2026 to 2 May 2027, notification is required for the use of either substance in the manufacture, or the importation, of consumer products other than machine lubricants or cosmetics containing the

³ CAS No. 26401-35-4 is associated with diisotridecyl adipate, used in plastics and PVC manufacturing and as a based fluid or additive in specialized industrial lubricants and greases.

substance at a concentration of at least 0.1% by weight. The annual quantity threshold is more than 1,000 kilograms (kg) for hexanedioic acid, 1,6-diisotridecyl ester for and more than 100 kg for alkanedioic acid, di-branched alkyl ester.

From 3 May 2027, use of either substance in the manufacture of these products at a concentration of at least 0.1% will constitute a significant new activity without a specified annual quantity threshold. Importation will constitute a significant new activity where the products contain the substance at a concentration of at least 0.1% and the total quantity imported in all such products exceeds 10 kg in a calendar year. For this purpose, the 2027 calendar year does not include the period from 1 January to 2 May 2027.

A SNAc Notification containing the prescribed information must be submitted to the Minister at least 90 days before undertaking a covered activity. The required information includes data that are sufficient to assess reproductive and developmental toxicity through the oral, dermal and inhalation routes and dermal penetration of the substance. The Minister has 90 days to assess the information. Activities involving research and development substances, site-limited intermediates or substances and products intended only for export are excluded.

[Order 2026-66.1-01-02](#), issued under subsection 66.1(1) of CEPA, removes 106 substances from Part I of the NDL following their addition to the DSL under the corresponding [Order 2026-66.1-01-01](#). Order 2026-66.1-01-01 was registered and came into force on 30 July 2026. As the entry into force of the NDSL Order is tied to that of the corresponding DSL Order, Order 2026-66.1-01-02 also came into force on 30 July 2026. Following their addition to the DSL, the 106 substances are no longer subject to the notification requirements under subsection 81(1) of the Act.

[Order 2026-66.1-01-01](#) adds 656 chemicals and polymers from the Revised In-Commerce List (R-ICL), identified by CAS Registry Number, to Part 1 of the DSL. The R-ICL covers substances found in products regulated under the Food and Drugs Act that were in Canadian commerce between 1 January 1987 and 13 September 2001. Consequently, these 656 substances are no longer subject to the New Substances Notification Regulations (Chemicals and Polymers) or the requirements under subsection 81(1) of CEPA. The Order does not introduce new regulatory requirements or incremental compliance costs for businesses.

For additional chemicals and polymers, [Order 2026-87-09-01](#) adds CAS No. 3057850-65-1 N-P to Part 1 and a confidential polymer identified by CAN 19838-6 N-P to Part 3. It also removes the “P” flag from CAS No. 82780-16-3 N-P, now CAS No. 82780-16-3 N, reflecting that its non-RRR version has now met the criteria for inclusion on the DSL.

For living organisms, [Order 2026-112-09-01](#) adds KAN-004 consortium containing human gastrointestinal bacteria and recombinant, non-replicating adeno-associated virus serotype 8 (AAV8) vector encoding human miniaturized dystrophin protein, microdystrophin (RGX-202) to Part 5 of the DSL. These organisms are consequently no longer subject to the New Substances Notification Regulations (Organisms).

Addition of 2,4-pentanedione to the Watch List (published)

Canada added 2,4-Pentanedione (2,4-PD; CAS No. 123-54-6) to the Canadian Environmental Protection Act (CEPA) [Watch List](#) after it was assessed with other nine ketones. The announcement of the assessment results was first published on 16 May 2026, where government proposed control over methyl ethyl ketone and methyl isobutyl ketone under the CEPA as they met criteria to be considered toxic, while 2,4-PD did not meet criteria to be considered toxic, but it was later added to the Watch List as a substance of potential concern.

During the assessment of 2,4-PD, the conclusion was that it does not pose a risk to the environment and human health at current exposure levels, but its effects could be concerning if the exposure was to increase, changing its risk level. Those

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 8 – 2026*



possible effects were the reason to include 2,4-PD on the Watch List as a substance of potential concern. It is not currently restricted, but changes in use may change the regulatory effects on it.

United States

Draft risk evaluations for o-dichlorobenzene, p-dichlorobenzene, ethylene dibromide, and 1,1,2-trichloroethane (draft)

The U.S. Environmental Protection Agency (EPA) has released draft risk evaluations under Section 6 of the Toxic Substances Control Act for o-dichlorobenzene (CAS No. 95-50-1), p-dichlorobenzene (CAS No. 106-46-7), ethylene dibromide (CAS No. 106-93-4), and 1,1,2-trichloroethane (1,1,2-TCA; CAS No. 79-00-5). TSCA risk evaluations determine whether a chemical presents an unreasonable risk of injury to health or the environment under its conditions of use, including risks to potentially exposed or susceptible subpopulations, without considering costs or other non-risk factors.

o-Dichlorobenzene and p-dichlorobenzene

EPA has preliminarily determined that [o-dichlorobenzene and p-dichlorobenzene](#) present an unreasonable risk to human health, driven primarily by certain conditions of use assessed in the draft evaluations. Uses of o-dichlorobenzene include processing as a reactant and use in solvents, dyes and pigments, lubricants, degreasers, inks, and paint strippers. Uses of p-dichlorobenzene include thermoplastic manufacture, solvents, air-care products, lubricants and greases, and building and construction products. Occupational and consumer exposure may occur through inhalation and dermal contact.

The draft hazard assessments for both dichlorobenzenes underwent external peer review by EPA's Science Advisory Committee on Chemicals (SACC) in June 2026. EPA states that further external peer review of the draft risk evaluations and their chemistry, fate, release, and exposure assessments is unnecessary because the hazard assessments and relevant methodologies have already undergone peer review. EPA will consider public comments and the SACC's input on the hazard assessments before finalizing the evaluations.

Ethylene dibromide

EPA has also preliminarily determined that [ethylene dibromide](#) presents an unreasonable risk to human health. The substance is primarily used as a lead scavenger in lead-containing aviation gasoline and in certain industrial and commercial applications. EPA evaluated potential exposure during manufacture, including import, processing, distribution, industrial and commercial use, aircraft refueling, and disposal.

The ethylene dibromide draft identifies significant contributions to unreasonable risk for workers and occupational non-users from inhalation and/or dermal exposure under ten conditions of use. Based on reasonably available information, EPA did not identify unreasonable risks to consumers, the general population, or the environment from ethylene dibromide itself.

The ethylene dibromide evaluation does not assess the lead contained in aviation gasoline. EPA addresses lead emissions from aircraft through separate authorities, and its 2023 endangerment finding for aircraft lead emissions remains in effect. EPA continues to support the FAA-led transition and the Eliminate Aviation Gasoline Lead Emissions initiative to eliminate leaded aviation fuel. EPA will consider public comments and input from the SACC peer review before issuing the final ethylene dibromide risk evaluation. All findings remain preliminary, and publication of the drafts does not change existing protections. If EPA continues to find unreasonable risk in the final evaluations, it will propose risk-management measures under TSCA section 6(a).

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 8 – 2026*



1,1,2-Trichloroethane

EPA's draft risk assessment for [1,1,2-TCA](#) (also see this [note](#) in the Federal Register) preliminarily determines that 1,1,2-TCA presents an unreasonable risk to human health, driven by worker inhalation and/or dermal exposures under 10 of the 12 assessed conditions of use (COUs). Four of those COUs also significantly contribute to inhalation risk for occupational non-users (ONUs).

The EPA's draft evaluation sets a provisional occupational exposure value of 0.001 parts per million (ppm) as an eight-hour time-weighted average, which is 10,000-fold lower than the current OSHA permissible exposure limit of 10 ppm. The draft evaluation preliminarily identifies the following COUs as significantly contributing to unreasonable risk to workers and/or occupational non-users:

- | | |
|--|---|
| » domestic manufacture | » recycling |
| » import | » industrial use as a solvent for cleaning and degreasing |
| » processing as a reactant in chemical manufacturing | » industrial and commercial use of adhesives and sealants |
| » processing for incorporation into adhesives and sealants | » disposal |
| » repackaging | » commercial use as a laboratory chemical |

The draft risk evaluation preliminarily determines that distribution in commerce and consumer use of adhesives and sealants do not significantly contribute to unreasonable risk. The EPA opened a 60-day public comment period ending on 28 September 2026. There are no penalties specified in this update.



OCEANIA

[Australia](#)

Modifications to requirements regarding occupational exposure to lead (consultation)

Safe Work Australia consulted on options to strengthen Part 7.2 of the model Work Health and Safety (WHS) Regulations, which regulates occupational exposure to lead (CAS No. 7439-92-1). The [consultation](#) examined whether the current definitions, health-monitoring requirements, and blood lead levels provide sufficient protection and can be implemented effectively. Safe Work Australia will use the feedback to prepare advice for its members, with any final recommendations submitted to Commonwealth, state, and territory WHS ministers. The consultation does not amend the model WHS Regulations, and any agreed changes would require implementation within the relevant jurisdictions.

The current Lead Regulations apply where a workplace carries out a defined "lead process". Work is classified as "lead risk work" where it is likely to cause a blood lead level exceeding 5 micrograms per deciliter (µg/dL) for females of reproductive capacity or 20 µg/dL for other workers. Workers must currently be removed from lead risk work at 10 µg/dL for females of reproductive capacity or 30 µg/dL for other workers. Return to lead risk work is permitted when levels fall below 5 µg/dL and 20 µg/dL, respectively.

Safe Work Australia considered broadening the definition of a lead process to cover any activity likely to expose a worker to lead, removing the existing definition and applying the requirements to all work likely to cause lead exposure, or retaining the definition with additional guidance. The regulatory options could bring more workplaces and activities within the specific lead-management requirements.

The consultation also considered reducing the blood lead level defining lead risk work for males and females not of reproductive capacity from 20 µg/dL to 10 µg/dL, while retaining the 5 µg/dL threshold for females of reproductive capacity. An alternative option would require health monitoring for all workers undertaking lead work, potentially including an initial follow-up test approximately two weeks after work begins.

Further options included reducing the worker-removal threshold from 10 µg/dL to 7.5 µg/dL for females of reproductive capacity and from 30 µg/dL to 15 µg/dL for other workers. For return to lead risk work, the threshold would remain below 5 µg/dL for females of reproductive capacity, while the threshold for other workers would decrease from below 20 µg/dL to below 10 µg/dL. Safe Work Australia also considered introducing an action level of 5 µg/dL for females of reproductive capacity and 10 µg/dL for other workers. At these levels, businesses would be required to investigate exposure, review control measures and take steps to reduce the worker's blood lead level before the removal threshold is reached.



SOUTH AMERICA

Brazil

Brazilian RoHS: Restrictions on hazardous substances in electronic and electrical equipment (in force)

On 10 July 2026, Brazil's National Council for the Environment (CONAMA) published [Resolution No. 516](#) (can also be found [here](#) in Portuguese), dated 8 July 2026. Informally referred to as the "Brazilian RoHS," the resolution establishes restrictions on hazardous substances in electrical and electronic equipment (EEE) marketed in Brazil. It entered into force on its date of publication.

The restrictions apply to covered EEE operating at nominal voltages of up to 1,000 volts alternating current or 1,500 volts direct current. They also cover parts, spare parts and specified connection or extension wires and cables with a nominal voltage below 250 volts. The following maximum concentrations apply by weight in homogeneous materials:

- | | |
|---|-------------------------------------|
| » polybrominated biphenyls (PBB): 0.1% | » Lead: 0.1% |
| » polybrominated diphenyl ethers (PBDE): 0.1% | » bis(2-ethylhexyl) phthalate: 0.1% |
| » mercury: 0.1% | » benzyl butyl phthalate: 0.1% |
| » cadmium: 0.01% | » dibutyl phthalate: 0.1% |
| » hexavalent chromium: 0.1% | » diisobutyl phthalate: 0.1% |

The requirements are being introduced in stages. The limits for PBB and PBDE have applied since 10 July 2026. Manufacturers and importers have 180 days from that date to comply with the mercury limit. The limits for cadmium, hexavalent chromium and lead apply from 10 July 2029, while the phthalate restrictions apply from 10 July 2030.

Transitional provisions apply to certain equipment, wires, cables, and spare parts associated with equipment designed and manufactured before the relevant compliance deadlines. Temporary exemptions may also be granted for specific

applications where elimination or substitution is technically or scientifically unfeasible, no reliable alternative is available, or substitution would result in greater life cycle impacts on the environment, health, or human safety.

Manufacturers and importers must ensure compliance and individually register each EEE product, model or product family in the National Registry of Electrical and Electronic Equipment with Hazardous Substance Restrictions. They must also issue a corresponding self-declaration of conformity. Companies will have one year from the date the registration system becomes available to enter the required information and issue the declarations. In addition, manufacturers and importers must maintain supporting technical documentation in Portuguese and retain the documentation and self-declaration for five years after the product is discontinued. Product identification and traceability information will be required from the issuance of the self-declaration. Distributors and merchants, including electronic commerce platforms, must require self-declaration as a condition of distribution or sale and provide it to the federal environmental authority upon request.

EEE subject to reverse logistics must display a crossed-out waste container symbol indicating the need for selective disposal. This requirement becomes applicable two years after issuance of the relevant self-declaration. If manufacturers or importers become aware that equipment already marketed is non-compliant, they must immediately notify the relevant environmental authorities, inform distributors and merchants to cease sales, correct the manufacturing or import process, and recall affected products in accordance with applicable legislation.

The resolution excludes several categories, including qualifying defense and state security equipment, space equipment and associated ground equipment, certain components specifically integrated into equipment outside the scope, large fixed industrial equipment and installations, most means of transport, professional non-road mobile machinery, implantable electrical medical devices, permanently installed photovoltaic modules, batteries, and EEE designed exclusively for research and development in a business or institutional context. The Ministry of Defense will establish criteria for the defense exclusion, including its application to dual-use equipment.

Within 180 days of publication, the Ministry of the Environment and Climate Change must publish the initial list of temporary exemptions, the procedures and criteria for requesting exemptions, and the minimum technical documentation requirements.

Law to establish the maximum permitted limit of lead in paints and similar surface coating materials (published)

Brazil published [Law No. 15,441](#) (available in Portuguese) on 29 June 2026 in the Official Gazette of the Union to establish lead limits for paints and similar surface coating materials and repeal Law No. 11,762 of 1 August 2008 when it enters into force. The law enters into force on 30 June 2027. The Law prohibits the manufacture, marketing, distribution, and importation of paints and similar surface coating materials containing lead at a concentration equal to or greater than 90 parts per million (ppm) by weight, expressed as metallic lead and determined on a dry basis or by total non-volatile content. Specified industrial or marine paints may contain up to 600 ppm of lead where they are biocide-based antifouling paints containing copper oxide or anticorrosive paints containing zinc powder.

Compliance with the applicable limits must be verified through laboratory testing conducted in accordance with national or international technical standards. Products manufactured or imported, or for which the importation process began before the Law enters into force, are excluded from the restriction.

Manufacturers and importers who fail to comply may receive a notification, have affected products seized, and be fined an amount equivalent to the value of the seized goods, without prejudice to applicable civil and criminal sanctions. Penalties

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 8 – 2026*



will be imposed by the competent executive authority through an administrative process, considering the nature and severity of the infringement and the resulting harm. The Executive Branch must issue implementing regulations.

DISCLAIMER

THIS DOCUMENT IS PROVIDED BY INTERNATIONAL AEROSPACE ENVIRONMENTAL GROUP, INC. ("IAEG") FOR INFORMATIONAL PURPOSES ONLY. ANY INACCURACY OR OMISSION IS NOT THE RESPONSIBILITY OF IAEG. DETERMINATION OF WHETHER AND/OR HOW TO USE ALL OR ANY PORTION OF THIS DOCUMENT IS TO BE MADE IN YOUR SOLE AND ABSOLUTE DISCRETION. PRIOR TO USING THIS DOCUMENT OR ITS CONTENTS, YOU SHOULD REVIEW IT WITH YOUR OWN LEGAL COUNSEL. NO PART OF THIS DOCUMENT CONSTITUTES LEGAL ADVICE. USE OF THIS DOCUMENT IS VOLUNTARY. IAEG DOES NOT MAKE ANY REPRESENTATIONS OR WARRANTIES WITH RESPECT TO THIS DOCUMENT OR ITS CONTENTS. IAEG HEREBY DISCLAIMS ALL WARRANTIES OF ANY NATURE, EXPRESS, IMPLIED OR OTHERWISE, OR ARISING FROM TRADE OR CUSTOM, INCLUDING, WITHOUT LIMITATION, ANY IMPLIED WARRANTIES OF MERCHANTABILITY, NONINFRINGEMENT, QUALITY, TITLE, FITNESS FOR A PARTICULAR PURPOSE, COMPLETENESS OR ACCURACY. TO THE FULLEST EXTENT PERMITTED BY APPLICABLE LAWS, IAEG SHALL NOT BE LIABLE FOR ANY LOSSES, EXPENSES OR DAMAGES OF ANY NATURE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL, PUNITIVE, DIRECT, INDIRECT OR CONSEQUENTIAL DAMAGES OR LOST INCOME OR PROFITS, RESULTING FROM OR ARISING OUT OF A COMPANY'S OR INDIVIDUAL'S USE OF THIS DOCUMENT, WHETHER ARISING IN TORT, CONTRACT, STATUTE, OR OTHERWISE, EVEN IF ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.