

Newsletter

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



Vol.6, Issue 1

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 1 – 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 Michele Lawrie-Munro at mLawriemunro@iaeg.com.

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ASIA

China

Submission of the 2025 Annual Activity Report for new chemical substances (published)

On 12 January 2026, the Solid Waste and Chemicals Management Technology Center of the Ministry of Ecology and Environment (MEE) published a notice on the submission of the 2025 annual activity report for new chemical substances, in accordance with the Measures for the Environmental Management Registration of New Chemical Substances (MEE Order No. 12) and the Announcement on Transitional Matters Related to New Chemical Substance Environmental Management Registration (MEE Announcement No. 46 of 2020).

The notice specifies that the reporting requirement applies to:

- » holders of regular registration certificates obtained under the former Measures for the Environmental Management of New Chemical Substances (former MEP Order No. 7), where the registered new chemical substance falls under the “key environmental management hazardous class” as referenced in Article 3 of that order, and
- » holders of regular registration certificates obtained under MEE Order No. 12, where the certificate requires submission of an annual report.

The specific regular registration certificates subject to the 2025 annual activity report are listed in the annex to the notice.

The report content must cover the substance’s actual 2025 production or import situation, environmental release situation, information transfer to downstream users, and implementation of environmental risk control measures and environmental management requirements. Reports must be submitted online by the certificate holder or its designated agent via the New Chemical Substance online registration system, accessed through the MEE government service portal. The reported information must be true and accurate, and the certificate holder or agent’s name, certificate number, and other key identifiers must match the registration certificate.

Penalties are not mentioned in the update. More information can be found in Chinese in this [notice](#) from MEE.

Notice on optimizing import and export regulatory measures for lithium thionyl chloride batteries (effective)

China has issued a joint notice to optimize import and export regulatory measures for certain lithium thionyl chloride (CAS No. 7439-93-1) batteries and battery packs, effective from 1 January 2026. The notice identifies thionyl chloride (CAS No. 7719-09-7) as a Category 3 controlled chemical under China’s controlled chemicals framework.

Under the notice, lithium thionyl chloride batteries or battery packs with a thionyl chloride filling amount of no more than 1 kilogram per battery or battery pack are no longer within the management scope of the Regulations on the Administration of Controlled Chemicals and the catalogue of controlled chemicals, and are no longer controlled items under the monitored chemicals category of the dual use export control list.

For products falling within this scope, importers and exporters are no longer required to obtain the Monitoring Chemical Import and Export Approval Certificate or the Dual Use Items and Technologies Import and Export License. However, companies must continue to truthfully declare the thionyl chloride content when completing customs formalities by declaring the filling amount per single battery or battery pack in the customs declaration *specification and model* field. Where lithium thionyl chloride batteries or battery packs are subject to import or export approval requirements due to other regulatory requirements, the relevant procedures must be handled in accordance with applicable rules.

Lithium thionyl chloride batteries that exceed the specified threshold or do not meet the conditions outlined in the notice remain subject to existing chemical control, export control, and customs requirements and require the Monitoring Chemical Import and Export Approval Certificate and the Dual Use Items and Technologies Import and Export License.

Penalties are not mentioned in the update. More information can be found [here](#) in Chinese.

The Law of the People's Republic of China on the Safety of Hazardous Chemicals (published)

The Standing Committee of the National People's Congress has passed the "Law of the People's Republic of China on the Safety of Hazardous Chemicals," establishing a comprehensive legal framework to regulate the lifecycle of hazardous chemicals. It defines hazardous chemicals as highly toxic chemicals and other chemicals possessing toxic, corrosive, explosive, combustible, or combustion-supporting properties that are harmful to the human body, facilities, or the ecological environment.

The legislation was created to strengthen safety management, prevent and reduce accidents, and protect human health, life, property, and the ecological environment. It emphasizes a governance model where industry management equates to safety management, mandating that enterprises assume primary responsibility while government departments implement supervision across production, storage, use, operation, and transport sectors. The legislation imposes strict lifecycle management requirements, mandating that new or expanded hazardous chemical production projects generally be located within certified chemical parks, which must undergo safety risk assessments every three years. Manufacturers and importers must provide Chinese Safety Data Sheets and safety labels that comply with national standards, and they are required to register their chemicals with the emergency management department.

The update impacts the supply chain:

- » manufacturers must obtain safety production permits and implement automated control systems
- » importers must ensure proper labelling and registration
- » distributors (operating enterprises) require licensing and are prohibited from selling to unlicensed entities

Furthermore, specific high-volume users must obtain safe use permits, and a strict licensing and tracking system is applied to road and water transport, including a prohibition on transporting toxic chemicals through closed internal waters.

The law was passed on 27 December 2025 and will enter into force on 1 May 2026. Penalties for non-compliance include fines ranging from 10,000 RMB to 1,000,000 RMB or higher, depending on the offence and aggravating factors, confiscation of illegal income and materials, suspension of business, revocation of licenses, and administrative detention or criminal liability for serious violations. Penalties are tiered by violation type and typically increase where corrective actions are refused or where serious consequences occur.

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

Japan

Update to Japan's Globally Harmonized System classification results (published)

Japan's National Institute of Technology and Evaluation (NITE) has updated its integrated Globally Harmonized System (GHS) of classification to reflect revised government GHS classification results for fiscal year 2025 (Reiwa 6). The updates incorporate corrections and revisions issued by the Japanese government during 2025. The GHS Comprehensive Information Provision Site serves as the central platform for publishing Japan's official and integrated GHS classifications. NITE first reflected the FY2025 government classifications in July 2025, followed by subsequent updates in September and December 2025 to incorporate partial revisions.

The update ensures that NITE's integrated GHS database accurately reflects the latest government hazard classifications for substances, supporting consistent hazard communication, SDS preparation and regulatory compliance. The site also confirms that classification results are now provided primarily via HTML-based access, reflecting changes in system support and tools. There are no new compliance obligations introduced by this update; however, companies are expected to rely on the most recent classification results when preparing labels, safety data sheets, and hazard communications under Japan's GHS framework.

More information on the update from NIE can be found [here](#) in Japanese. The classifications list is [here](#).

Amendment of the Enforcement Order of the Chemical Substance Control Law, etc. and open consultation on expanding the notifiable-exempt substances list (consultation)

In light of the decision made at the 10th Conference of the Parties to the Stockholm Convention on Persistent Organic Pollutants (held in June 2022) on new substances subject to elimination, the Enforcement Order of the Chemical Substances Control Law (CSCL) (Cabinet Order No. 202 of 1974; hereinafter referred to as the "Order") was amended to designate perfluorohexanesulfonic acid (PFHxS; CAS No. 355-46-4) related substances as Class 1 Specified Chemical Substances under the CSCL. This status would impose bans on their manufacture, import, and use, as well as the import of products containing them. The prohibition was implemented on 17 December 2025 with a transitional period until 17 June 2026.

The CSCL was enacted in 1973 to prevent environmental pollution by chemical substances. CSCL imposes obligations on manufacturers and importers of a chemical substance in Japan. These requirements depend on the status of the substance in question. There are four points to the amendment:

- » addition of PFHxS-related substances to the list of Class 1 Specified Chemical Substances (effective from 17 June 2026)
- » designation of products that cannot be imported if they contain Class 1 specified chemical substances (Article 7 of the Order) – ten types of products, such as fabrics that have been treated to give them water-repellent or oil-repellent properties, will be designated as products that cannot be imported if they contain PFHxS-related substances (effective from 17 June 2026)
- » Removal of the exempted use for the Class I Specified Chemical Substance 8:2 fluorotelomer alcohol (CAS No. 678-39-7) from the list (effective from 17 December 2025)
- » Temporary designation of fire extinguishers, fire-extinguishing agents for fire extinguishers, and foam fire-extinguishing agents containing PFHxS-related substances as products that must comply with nationally established technical standards during handling (effective from 17 June 2026)

Additionally, on 26 December 2025, the Ministry of Health, Labor, and Welfare, Ministry of Economy, Trade and Industry, and Ministry of the Environment announced a public consultation on the list of more than 40 substances that might be added to the notifiable-exempt substances list. They are not considered to be subject to Article 2, Paragraph 2 or 3 of the Act on the Examination of Chemical Substances and Regulation of Their Manufacture, etc., and other substances not requiring evaluation under Paragraph 5 of the same Article. These substances mostly have low toxicity, high molecular weight, are insoluble in water/acids/alkali and do not pose a risk to health or the environment.

Comments were due on 25 January 2026. More information can be found in Japanese in these links on the [public comment](#) and in this [press release](#).

[South Korea](#)

[New classifications and transition schedules for products utilizing hydrofluorocarbons \(effective\)](#)

On 1 December 2025, South Korean Ministry of Climate, Energy, and Environment (MCEE) and the Ministry of Trade, Industry, and Resources (MOTIR) published a [notice](#) (can also be found [here](#) in Korean) to provide new classifications and transition schedules for products utilizing hydrofluorocarbons (HFCs). The measures mandate a shift toward substances with lower Global Warming Potential (GWP) to meet national greenhouse gas reduction targets. This regulatory framework is established under Article 17 of the Act on the Management of Specific Substances for the Protection of the Ozone Layer. It serves as the primary legal mechanism for South Korea to fulfill its international commitments under the Kigali Amendment to the Montreal Protocol, which requires a progressive reduction in HFC consumption to mitigate global warming.

The Notice establishes GWP-based restrictions on the manufacture and importation of specific product categories. These classifications utilize GWP values derived from the Intergovernmental Panel on Climate Change Fifth Assessment Synthesis Report to determine compliance.

The restrictions apply to a wide range of sectors, with transition dates staggered between 1 January 2027 and 1 January 2032. Key affected products and their respective deadlines include:

- » stationary air conditioning units – units with a capacity up to 12 (kW) and a GWP of 750 or higher are restricted from 1 January 2028; those over 12kW from 1 January 2030
- » refrigeration and household appliances – these include household refrigerators, dryers, dehumidifiers, ice equipment, and commercial vending machines
- » mobile units – this covers air conditioning in motor vehicles and mobile refrigeration units used in transport
- » fire-extinguishing systems – specialized equipment using HFC-based suppressants.

Under the new criteria, several exemptions remain in place, most notably for HFC-containing products manufactured domestically specifically for the export market. The MCEE and MOTIR have indicated that these transition criteria may be further adjusted in the future to reflect ongoing technological developments and evolving national climate goals. Penalties for non-compliance are not provided for this notice.



EUROPE

European Union

Adaptions of four Carbon Border Adjustment Mechanism (CBAM) related regulations (effective)

The European Commission adopted four CBAM-related Commission Implementing Regulations under Regulation (EU) 2023/956, published in the Official Journal on 22 December 2025, to establish additional implementing rules for CBAM and to amend and correct certain existing implementing provisions. Together, they address the calculation and publication of the CBAM certificate price, the calculation of the free allocation adjustment to the number of CBAM certificates to be surrendered, and procedural and technical updates concerning authorized CBAM declarant status and the CBAM registry.

Implementing [Regulation \(EU\) 2025/2548](#) sets out how the Commission will calculate and publish the price of CBAM certificates based on the European Union (EU) EU Emission Trading System auction clearing prices. It provides for a quarterly average methodology for 2026 and establishes arrangements for publication on the Commission website and for making the price available through the CBAM registry, with a shift to a weekly pricing approach from 1 January 2027, supported by information provision from auction platforms and related operational measures.

Implementing [Regulation \(EU\) 2025/2620](#) establishes the methodology for calculating the free allocation adjustment to the number of CBAM certificates to be surrendered, including rules for calculating specific embedded free allocation where embedded emissions are reported using actual data and where default values are used. It also specifies that the adjustment for electrical energy (CN code 2716 00 00) is zero and sets out how embedded free allocation is determined where precursors originate from multiple installations, including a default weighted average approach and conditions for using alternative approaches where evidence supports them. The regulation contains an annex setting out the detailed calculation approach and indicates that it should be revised in 2027.

Implementing [Regulation \(EU\) 2025/2549](#) amends and corrects Implementing Regulation (EU) 2025/486 on the conditions and procedures related to authorized CBAM declarant status, including updates reflecting changes introduced by Regulation (EU) 2025/2083. The amendments and corrections include procedural adjustments such as i) consultation being optional, ii) the use of calendar day-based time limits (including observation periods not exceeding 15 calendar days, and shorter periods in specific circumstances), and iii) revised provisions relevant to application processing and revocation scenarios, including specific dates referenced for certain procedural outcomes.

Implementing [Regulation \(EU\) 2025/2550](#) amends and corrects Implementing Regulation (EU) 2024/3210 regarding the CBAM registry to align registry provisions with amended CBAM rules and to update certain registry functionalities and references, including interactions with customs authorities and other registry users. It includes provisions relevant to the use of the registry by customs authorities for validation and data exchange and provides for independent person registration and use of the registry (including that access should be granted no earlier than 1 December 2026), as well as cross-checking using the EORI¹ data set referenced in an annex. The act does not set penalty levels, but it includes provisions on communicating decisions on penalties via the registry.

¹ EORI = Electronic System for the Online Registration of Importers

All four implementing regulations enter into force on the third day following publication in the Official Journal. Implementing Regulation (EU) 2025/2548 and Implementing Regulation (EU) 2025/2620 apply from 1 January 2026, while Implementing Regulation (EU) 2025/2550 specifies that only certain amendment points apply from 1 January 2026, and Implementing Regulation (EU) 2025/2549 does not specify a separate application date in the provisions cited. None of the four acts establishes specific fines or penalty amounts within their texts.

New package of measures to boost circularity of plastics (published)

The European Commission's 23 December 2025 communication launches a [pilot](#) to strengthen the circularity of plastics by harmonizing end of waste criteria, establishing mass balance rules for chemically recycled plastics, and addressing market fragmentation that is undermining the European Union (EU) recyclers. The initiative focuses on challenges such as high energy costs, competition from falsely claimed recycled imports, slowing recycling capacity growth, and the need for a more integrated EU market for secondary plastics. It also begins processes associated with implementing acts under the Waste Framework Directive and re-launches the Circular Plastics Alliance for 2026 work planning. Further, it outlines several 2026 actions – including enhanced customs controls, amendments to food contact plastics regulations, and monitoring of plastic waste export rules taking effect in November 2026 – all intended to stabilize supply, improve compliance, and support industry investment under predictable regulatory conditions.

This package does not introduce compliance obligations. It has indirect relevance to the Aerospace and Defense (A&D) sector. Any A&D organization relying on plastic components, packaging materials, or suppliers using recycled content may experience changes to documentation expectations, supplier verification processes, material availability, or cost structures as these EU wide plastics rules take effect. The communication's measures target the plastics value chain itself. Exposure for the A&D sector arises only through upstream plastics sourcing and the broader shift toward a harmonized circular plastics market.

Amendment to Regulation (EU) 2024/2865 to defer dates of application for specific classification, labeling, and packaging obligations (published)

On 3 December 2025, the European Commission published [Regulation \(EU\) 2025/2439](#) which amends Regulation (EU) 2024/2865 to defer the dates of application for specific classification, labeling, and packaging (CLP) obligations, including rules regarding label formatting, advertisements, distance sales, and filling stations. Analysis of Regulation (EC) No 1272/2008 (CLP) had identified excessive costs and administrative burdens associated with the specific requirements previously introduced by Regulation (EU) 2024/2865. The deferral aims to reduce administrative burden and allow time for the Commission to introduce further simplification measures.

New Dates of Application include:

- » the application date for rules concerning label formatting, relabeling timelines, and information requirements for advertisements and distance sales is deferred to 1 July 2026
- » a second set of provisions (specifically Article 1, points (1) and (9), and Annex IV of Regulation (EU) 2024/2865) will apply from 1 January 2027
- » the application date for labeling fuels at filling stations is deferred to 1 January 2028 to address findings that requirements to indicate the supplier, nominal quantity, and unique formula identifier at pumps were "impractical and costly" without providing health benefits; the Commission intends to modify these requirements to remove unnecessary burdens before they become mandatory

Transitional Dates include:

- » voluntary application permitted until 30 June 2026 for formatting and advertisement rules
- » voluntary application is permitted until 31 December 2026 for the specific provisions applying in 2027
- » voluntary application is permitted until 31 December 2027 for the labeling of fuels at filling stations

There are no penalties associated with this update.

Amendment to Directive 2011/65/EU regarding exemption for lead in glass or ceramic components (published)

The European Commission published a directive that amends Directive 2011/65/EU on the Restriction of certain Hazardous Substances in electrical and electronic equipment (EEE), commonly referred to as “RoHS 2”. RoHS 2 expanded the scope of products covered in the original directive and imposed new obligations on EEE manufacturers. [Directive \(EU\) 2025/2363](#) extends exemptions for using lead in glass or ceramic components by updating existing exemptions (7(c)-I and 7(c)-II) and adding new ones (7(c)-V and 7(c)-VI) within Annex III of Directive 2011/65/EU:

- » 7(c)-I: General Glass or Ceramic Components: 30 June 2027²
- » 7(c)-II: High-Voltage Capacitors: 31 December 2027
- » 7(c)-V: Specific Glass Applications: 31 December 2027
- » 7(c)-VI: Specific Ceramic Applications: 31 December 2027

There are no penalties associated with these updates.

Amendment to Regulation (EU) 2017/852 regarding mercury-added products subject to manufacturing, import, and export prohibitions (adopted)

On 17 December 2025, the European Commission adopted a [Delegated Regulation amending Regulation \(EU\) 2017/852](#) of the European Parliament and of the Council regarding mercury-added products subject to manufacturing, import, and export prohibitions. Annex II to Regulation (EU) 2017/852, which lists mercury-added products prohibited from export, import, and manufacturing in the European Union (EU), has been amended to insert Entry 2a. This amendment aligns EU legislation with Decision MC-5/4 of the Minamata Convention.

A new Entry 2a is inserted to include:

- » very high accuracy capacitance and loss measurement bridges and high frequency radio frequency switches and relays in monitoring and control instruments
 - with a maximum mercury content of 20 milligrams per bridge, switch, or relay
 - except these used for research and development purposes

The amendment will enter into force three days after its publication in the Official Journal of the European Union. It shall be binding in its entirety and directly applicable in all Member States.

Penalties for non-compliance with Regulation (EU) 2017/852 are determined and enforced by Member States.

² Exemption 7(c)-I applies to all categories and expires before the more specific applications of the other exemptions.

Amendments to Annex XVII to REACH to establish new consumer supply restrictions for substances classified as carcinogenic, mutagenic, or reproductive toxicant (consultation)

The European Commission has published a [draft Commission Regulation](#) proposing amendments to Annex XVII to Regulation (EC) No 1907/2006 (REACH). The draft concerns the consumer supply restrictions for substances classified as carcinogenic, germ cell mutagenic, or reproductive toxicant (CMR) category 1A or 1B and reflects harmonized classifications introduced under Commission Delegated Regulations (EU) 2024/2564 and (EU) 2025/1222.

The draft revises the general restriction conditions for Entries 28, 29 and 30 to incorporate additivity rules for classification purposes, in line with Regulation (EC) No 1272/2008 (CLP). It updates Appendices 1, 2, 4 and 6 by adding substances, replacing certain entries, and updating CAS numbers for three substances in Appendices 1 and 2, including petroleum-related entries. The substances added include fluoroethylene multi-walled carbon tubes, acetone oxime (EC No. not available, CAS No. 127-06-0), trimethyl phosphate (EC No. 208-144-8, CAS No. 512-56-1), barium chromate (EC No. not available, CAS No. 10294-40-3), 1,1-dichloroethylene (EC No. 130000-1-0, CAS No. 75-35-4), and N,N'-methylene diacrylamide (EC No. 203-750-9, CAS No. 110-26-9). It also deletes six index numbers in Appendix 6.

The draft amends Appendix 11 by deleting an expired derogation and adding a derogation for dinitrogen oxide (EC No. 233-032-0, CAS No. 10024-97-2) for specified uses. This includes cartridges containing the substance for use as a food additive subject to conditions, including a maximum cartridge volume of 24 milliliters (ml), a maximum total volume of 120 ml per individual per day, restriction of sale to individuals aged 18 years or older, and an effective age verification system. The derogation also covers aerosol dispensers for food products designed for use of the substance as a food additive and food prepared using dinitrogen oxide as a food additive.

The draft provides that the Regulation would enter into force 20 days after publication in the Official Journal of the European Union. It also provides that specified points of the Annex apply from 1 February 2027.

Four substances recommended for REACH authorization (draft)

On 18 November 2025, the European Chemicals Agency (ECHA) recommended that the European Commission add four substances from the Candidate List to the REACH Authorization List (Annex XIV). This process aims to ensure that the continued use of these substances of very high concern (SVHC) is either phased out or strictly controlled to protect human health and the environment. Once added, companies must obtain authorization for specific uses after a given sunset date.

The [recommendation](#) covers the following substances:

- » barium diboron tetraoxide (EC No. 237-222-4, CAS No. 13701-59-2)
- » S-(tricyclo[5.2.1.0 2,6]deca-3-en-8(or 9)-yl) O-(isopropyl or isobutyl or 2-ethylhexyl) O-(isopropyl or isobutyl or 2-ethylhexyl) phosphorodithioate (EC No. 401-850-9, CAS No. 255881-94-8)
- » diphenyl(2,4,6-trimethylbenzoyl)phosphine oxide (EC No. 278-355-8, CAS No. 75980-60-8)
- » melamine (EC No. 203-615-4, CAS No. 108-78-1)

ECHA prioritized these substances based on agreed criteria. Regarding melamine, ECHA acknowledged extensive stakeholder feedback from the 2024 consultation. It clarified that most of its uses as an intermediate are exempt from authorization. However, for remaining uses, the authorization process may create significant administrative effort. ECHA concluded that balancing the risks of melamine against its continued use is a policy decision for the Commission and European Union Member States.

Ecodesign requirements for sustainable and circular apparel textiles (initiative)

The European Commission has published an initiative titled [Ecodesign Requirements for Sustainable and Circular Apparel Textiles](#), which is in preparation and planned as a delegated regulation. The initiative supports the European Union strategy for sustainable and circular textiles and aims to develop ecodesign requirements to promote sustainable and circular design of apparel textiles and improve access to information relevant to the sustainability and circularity of apparel textiles. Commission adoption is planned for the first quarter of 2027.

Hazard classifications for four substances (consultation)

On 15 December 2025, the European Chemicals Agency (ECHA) launched a consultation on the hazard classifications for the following four substances:

[brodifacoum \(ISO\)](#) (EC No. 259-980-5, CAS No. 56073-10-0)

- » acute toxicity – inhalation
- » acute toxicity – dermal
- » acute toxicity - oral

[fluoxapiprolin \(ISO\); 2-{3-\[2-\(1-\[\[3,5-bis\(difluoromethyl\)-1H-pyrazol-1-yl\]acetyl\)-4-piperidinyl\]-1,3-thiazol-4-yl\]-4,5-dihydro-1,2-oxazol-5-yl}-3-chlorophenyl methanesulfonate](#) (EC No. not available, CAS No. 1360819-11-9)

- » explosive
- » flammable solid
- » self-reactive substance or mixture
- » pyrophoric solid
- » self-heating substance or mixture
- » substance or mixture which in contact with water emits flammable gas oxidizing solid
- » substance or mixture corrosive to metals
- » acute toxicity – inhalation
- » acute toxicity – dermal
- » acute toxicity – oral
- » skin corrosion/irritation
- » serious eye damage/eye irritation
- » respiratory sensitization
- » skin sensitization
- » germ cell mutagenicity
- » carcinogenicity
- » reproductive toxicity
- » specific target organ toxicity - single exposure
- » specific target organ toxicity - repeated exposure
- » aspiration hazard
- » hazardous to the aquatic environment

[reaction products of phosphoryl trichloride and methyloxirane \[1\]; tris\(2-chloro-1-methylethyl\) phosphate \[2\]; bis\(2-chloro-1-methylethyl\) 2-chloropropyl phosphate \[3\]; bis\(2-chloropropyl\) 2-chloro-1-methylethyl phosphate \[4\]; tris\(2-chloropropyl\) phosphate \[5\]](#); any individual stereoisomer of the substances listed above and any combination thereof

- » carcinogenicity
- » germ cell
- » mutagenicity
- » reproductive toxicity
- » endocrine disruptor for human health

[tris\[2-chloro-1-\(chloromethyl\)ethyl\] phosphate](#) (EC No. 237-159-2, CAS No. 13674-87-8)

- » hazard classification:
- » reproductive toxicity
- » endocrine disruptor for human health

Comments were due on 13 February 2026.

[Calls for comments and evidence on a group of phenyl-p-phenylenediamines and para-substituted phenylenediamines \(consultation\)](#)

The European Chemicals Agency (ECHA) has opened a [call for comments and evidence](#) on a group of phenyl-p-phenylenediamines (PPDs) and para-substituted phenylenediamines (PDs) used as anti-oxidants and anti-ozonants in rubber tires. The call supports the intention of the Netherlands and Austria to prepare an Annex XV restriction dossier under REACH.

ECHA is seeking information on the technical function of PPDs/PDs in tires, their (eco)toxicological properties, environmental fate, and presence (including from tire wear), potential alternatives, and socio-economic impacts. The call is open to European Union (EU) and non-EU stakeholders and forms part of the preparatory phase of the restriction process; it does not replace the formal public consultation that would follow a submitted restriction proposal. Comments were due on 13 February 2026.

[France](#)

[Decree No. 2025-1376 establishes implementation rules on the prohibition of perfluoroalkyl and polyfluoroalkyl substances \(in force\)](#)

Decree No. 2025-1376 establishes the implementation rules for the prohibition of manufacturing, importing, exporting, and placing on the market specific consumer products, including textiles and waterproofing agents, which contain per- and polyfluoroalkyl substances (PFAS). It serves to apply Articles L. 524-1 and L. 524-2 of the Environmental Code, as modified by Law n° 2025-188 of 27 February 2025, which was enacted to protect the population from risks resulting from exposure to these substances.

This regulation inserts a new Chapter V into the Environmental Code, defining PFAS as any substance containing at least one fully fluorinated methyl (CF₃-) or methylene (-CF₂-) carbon atom without attached hydrogen, chlorine, bromine, or iodine. The regulation also defines “placing on the market” as the act of supplying a product or making it available to a third party for the first time, whether for consideration or not, and states that any importation is considered equivalent to placing on the market.

The ban applies when residual PFAS concentrations exceed specific thresholds: 25 parts per billion (ppb) for any targeted PFAS (excluding polymers), 250 ppb for the sum of targeted PFAS (excluding polymers), and 50,000 ppb for PFAS including polymers. Manufacturers, importers, and exporters of covered products must comply with these limits; if total fluorine exceeds 50 milligrams per kilogram, they must provide proof whether the fluorine content originates from PFAS or from non-PFAS substances. Exemptions are provided for personal protective equipment (PPE) (including military and security uses), waterproofing agents for such PPE, and industrial technical textiles.

The Decree entered into force on 1 January 2026, with a transitional period allowing products manufactured before this date to be placed on the market or exported for a maximum of 12 months. Penalties for non-compliance are not mentioned in the update.

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

Hungary

Amendment of Decree 5/2020. (II. 6.) ITM on the protection of the health and safety of workers exposed to chemical agents (in force)

On 19 December 2025, the Minister for the National Economy issued [Decree 41/2025](#) (also can be found [here](#) in Hungarian) to amend Decree 5/2020. (II. 6.) ITM concerning the protection of the health and safety of workers exposed to chemical agents. This amendment modifies entries in various Annexes of Decree 5/2020, with modification of the entries for asbestos, benzene, and nickel becoming effective on 21 December 2025, as well as two other modifications of entries for benzene and N-methyl-2-pyrrolidone becoming effective on 5 April 2026.

This amendment partially serves as a transposition of the lowered occupational exposure limit (OEL) for asbestos fibers in Directive (EU) 2023/2668. It harmonizes with the full transposition of the Directive issued on the same day in Decree 40/2025. (XII. 19.) NGM of the Minister for National Economy on the protection of workers from risks related to exposure to asbestos.

The modified entry for asbestos in Annex 2 of Decree 5/2020 (permissible concentrations of fibrous dusts) references Decree 40/202:

- » 0.01 fibers/cubic centimeter (cm³; time-weighted average, calculated for eight hours in accordance with the measurement requirements contained in the decree on the protection of workers exposed to risks related to asbestos), or
- » 0.002 fibers/cm³ (time-weighted average, calculated for eight hours)

As described, in Decree 40/202, the second OEL criterion is applicable on 21 December 2029 and applies when fibers with a diameter less than 0.2 micrometers are not included in the count.

Unrelated modifications are also made to other Annexes of Decree 5/2020.

- » Annex 3 – permissible limits for biological exposure and effect indicators to be tested in case of occupational chemical exposure in urine:
 - Row 5 – benzene (measured as S-phenylmercapturic acid) – 0.022 milligram/gram (mg/g) creatinine
 - Row 21 – nickel – 0.0030 mg/g creatinine
- » Annex I – hazardous substances in the workplace air (Effective 5 April 2026):
 - Row 216 – N-methyl-2-pyrrolidone (EC No. 212-828-1, CAS No. 872-50-4) characteristic property: b, Repr.(1B) BEM
 - Row 32 – benzene (EC No. 200-753-7, CAS No. 71-43-2) average OEL value: 0.5 parts per million

Penalties for non-compliance are not explicitly specified in this text, but violations are subject to the broader legal framework of the Act on Work Safety (Act XCIII of 1993).

Amendment of Government Decree 376/2020. (VII. 30.) on certain provisions related to the execution of Regulation (EU) 2019/1021 on persistent organic pollutants (in force)

On 30 December 2025, Hungary published Government [Decree 472/2025](#) (can also be found [here](#) in Hungarian) amending Government Decree 376/2020, to transpose recent European Union (EU) Commission Delegated Regulations that added three persistent organic pollutants (POPs) to the EU POPs Regulation (EU) 2019/1021. This amendment incorporates these into the Hungarian legal framework enforcing the EU POPs Regulation and came into force on 31 December 2025.

This amendment mandates the implementation of Commission Delegated Regulations (EU) 2025/843, (EU) 2025/1930, and (EU) 2023/1608 within Hungary, adding the following substances to the national list of persistent organic pollutants in Annex I of Decree 376/2020:

- » perfluorohexane sulfonic acid (PFHxS) (EC No. 206-587-1, CAS No.355-46-4), its salts and PFHxS-related compounds
- » 2-(2H-benzotriazol-2-yl)-4,6-di-tert-pentylphenol (UV-328) (EC No. 247-384-8, CAS No.25973-55-1)
- » Dechlorane Plus (EC No. 236-948-9, CAS No. 13560-89-9)

Violations of the EU POPs Regulation are now subject to penalties under the provisions of Decree 376/2020 for these substances.

Amendment of certain government decrees related to the extended producer responsibility system for the purpose of legal harmonization (in force)

Government [Decree 412/2025](#) (can also be found [here](#) in Hungarian) amends several existing Hungarian government decrees related to waste management and the extended producer responsibility (EPR) system to harmonize national legislation with European Union (EU) regulations. Specifically, the decree updates domestic laws to ensure consistency with Regulation (EU) 2025/40 on packaging and packaging waste and Regulation (EU) 2024/1157 on waste shipments. The legislative aim is to enforce the binding provisions of these EU acts to protect the environment and ensure compliance regarding environmental product fees, single-use plastics, and waste management activities.

The decree contains five annexes that replace or supplement tables in previous decrees:

- » Annex 1 updates product fee codes (KT codes) for plastic carrier bags in Gov. Decree 343/2011
- » Annex 2 modifies a code in Gov. Decree 349/2021
- » Annex 3 replaces the fee codes for batteries, accumulators, and furniture in Gov. Decree 80/2023
- » Annex 4 mandates the reporting of brand names for packaging products
- » Annex 5 adds a risk multiplier for EPR fulfilment activities to the financial guarantee rules in Gov. Decree 681/2023

This update aligns definitions, such as "composite packaging" and "packaging," directly with Regulation (EU) 2025/40. It updates heavy metal concentration limits (lead, cadmium, mercury, hexavalent chromium) to reference Article 5(4) of the EU Regulation, while providing exemptions for glass packaging containing recycled material and specific plastic crates and pallets.

For EPR, concession companies must now obtain a specific waste management permit for EPR activities and ensure invoices issued to producers contain the KF code. Manufacturers of certain single-use plastic products must keep records of the product's origin (domestic, EU, or non-EU). Additionally, producers must report the brand names under which packaging is marketed. The update also modifies waste shipment documentation requirements to prove compliance with Regulation (EU) 2024/1157 rather than the repealed Regulation (EC) No 1013/2006.

The decree generally entered into force on 1 January 2026, except for Section 2, which enters into force on the 31st day following promulgation. The update amends Government Decree 156/2025 to establish that infringements of Regulation (EU) 2025/40 constitute grounds for sanctions. Penalties for non-compliance include waste management fines and on-the-spot fines for natural and legal persons who infringe the provisions of the EU packaging regulation.

Italy

Legislative Decree 7 January 2026, n. 2 to implement amendments made by Directive 2012/19/EU on waste electrical and electronic equipment (in force)

Legislative Decree 7 January 2026, n. 2 was published on 9 January 2026 and amended Articles 4, 23, 24, 28, and 40 of Legislative Decree No. 49 of 14 March 2014. It implements amendments made by [Directive \(EU\) 2024/884](#) of the European Parliament and of the Council of 13 March 2024 to Directive 2012/19/EU on waste electrical and electronic equipment (WEEE). This decree consists of 7 Articles.

For Article 4 of Legislative Decree No. 49 of 14 March 2014, letter o) is replaced by the following:

- » “historical WEEE” with “WEEE deriving from:”
 - electrical and electronic equipment referred to in Article 2, paragraph 1, letter a), other than photovoltaic panels, placed on the market on or before 13 August 2005
 - electrical and electronic equipment referred to in Article 2, paragraph 1, letter b), other than photovoltaic panels, placed on the market before 15 August 2018 and not included among those referred to in Article 2, paragraph 1, letter a), in accordance with the provisions relating to extended producer responsibility

For Article 28 of Legislative Decree No. 49 of 14 March 2014, the changes are as follows:

- » the following sentences are added at the end of paragraph 1: “For photovoltaic panels, the obligation applies to those placed on the market starting from 13 August 2012. With regard to the EEE referred to in Article 2, paragraph 1, letter b), which do not fall within the scope of Article 2, paragraph 1, letter a), the obligation applies only to those placed on the market starting from 15 August 2018.”
- » in paragraph 2, “CEI EN 50419:2006-05” is replaced with “CEI EN 50419:2023-02” and “CENELEC EN 50419:2006-03” is replaced with “CENELEC EN 50419:2022”
- » in paragraph 4, “CEI EN 50419:2006-05” is replaced with “CEI 50419:2023-02”

For Articles 23 and 24 of Legislative Decree No. 49 of 14 March 2014, in paragraph 1 of both Articles, referral to Article 4 paragraph 1 letter o was amended in accordance with the changes mentioned before. Additionally, in Article 24 and 24-bis, the wording has been amended to clarify the text and intent.

Article 40 of Legislative Decree No. 49 of 14 March 2014 was amended by deleting the first sentence.

Legislative Decree 7 January 2026, n. 2 came into force on 24 January 2026.

More information can be found in Italian [here](#) in regards to Legislative Decree 7.

Poland

Act on Supervision of General Product Safety (in force)

Poland has adopted the [Act of 7 November 2025](#) (can also be found [here](#) in Polish) on Supervision of General Product Safety, published in the Official Journal on 19 December 2025. The Act establishes the legal framework for supervising the safety of products placed on the Polish market to ensure consumer protection and alignment with the European Union (EU) product safety legislation. The Act references EU Regulation on general product safety and integrates principles of EU market surveillance, strengthening national oversight of product safety and compliance mechanisms.

The Act:

- » establishes national procedures for supervising general product safety
- » applies to products placed on the Polish market within the scope of EU product safety rules
- » defines the responsibilities of public authorities including the President of the Office of Competition and Consumer Protection (UOKiK) and regional supervisory inspectors
- » aligns national oversight mechanisms with EU systems such as the EU product safety framework and related surveillance cooperation
- » modernizes Poland's general product safety supervision system, aligning it with recent EU developments while strengthening enforcement capability and consumer protection

Economic operators placing products on the Polish market (manufacturers, importers, distributors, and online platforms) must ensure compliance with strengthened supervision, documentation, and cooperation obligations under Polish and EU safety legislation. Penalties for non-compliance include administrative fines of up to PLN 1,000,000 per violation, mandatory product recalls, the destruction of dangerous goods, and the restriction of access to online trading interfaces.

Amendment to the Act on the System of Greenhouse Gas Emissions Management and Certain Other Laws (in force)

Poland has adopted the [Act of 21 November 2025](#) (can also be found [here](#) in Polish) amending the Act on the System of Greenhouse Gas Emissions Management and Certain Other Laws, published in Dziennik Ustaw on 29 December 2025. The amendment updates Poland's national framework for managing greenhouse gas emissions, introducing legal and administrative changes to improve oversight, reporting, and implementation of climate-related obligations.

The Act modifies core provisions of Poland's primary emissions management legislation, originally established in 2009, to ensure continued alignment with evolving the European Union (EU) climate policy, including mechanisms linked to greenhouse gas reporting, emissions monitoring, and the functioning of climate regulatory instruments such as those associated with the EU Carbon Border Adjustment Mechanism (CBAM) framework (EU Regulation 2023/956).

The amendment updates key elements of Poland's greenhouse gas emissions management system, including:

- » changes to administrative responsibilities and legal structures governing emissions management
- » updates to reporting and oversight provisions to strengthen data governance and compliance clarity
- » further alignment of Polish national rules with EU climate legislation referenced within the Act

This update strengthens Poland's national legal infrastructure for greenhouse gas governance, improves administrative certainty, and supports continuity with the EU climate regulatory framework.

Amendments to the Act on Waste Electrical and Electronic Equipment and certain other acts (draft)

On 8 December 2025, the Ministry of Climate and Environment created a [draft act](#) (can also be found [here](#) in Polish) amending the Act of 11 September 2015 on Waste Electrical and Electronic Equipment (WEEE), as well as the Acts on the recycling of end-of-life vehicles, waste, and the management of packaging and packaging waste, to implement the third subparagraph of Article 8a(5) of Directive (EU) 2018/851 and Directive (EU) 2024/884 on WEEE.

For WEEE, the draft clarifies which entity introducing equipment is responsible for financing the collection and processing of waste equipment from households and from users other than households, using specific date cut-offs and distinguishing

between equipment listed in Annex 6, photovoltaic panels, and other equipment. For end-of-life vehicles, it defines factory remanufacturing and sets conditions under which removed parts destined for factory remanufacturing are not considered waste, including storage, documentation, and transport requirements.

Across the waste and packaging framework, the draft introduces a system of authorized representatives for entities established in other EU Member States that introduce vehicles or packaged products onto the Polish market, and expands the national register obligations so that authorized representatives and the entities they represent, together with relevant contract and volume information, are properly recorded.

The draft stipulates that the Act will enter into force 14 days after its publication.

[United Kingdom](#)

[Summary of responses and government's response and extension to the UK REACH transitional registration submission deadlines \(draft\)](#)

On 22 December 2025, the United Kingdom (UK) Department for Environment, Food & Rural Affairs (Defra) published a [summary of responses and the government response](#) to its consultation on proposals to extend the UK REACH transitional registration submission deadlines.³ Following its assessment of stakeholder feedback, the UK government confirmed its intention to extend the current UK REACH submission deadlines. As a result, the existing deadlines of 27 October 2026, 27 October 2028, and 27 October 2030 will be extended to 27 October 2029, 27 October 2030, and 27 October 2031, respectively.

Defra has indicated that revised legislation will be introduced in 2026, subject to the usual parliamentary process and devolved administrations' consent. This timeline is intended to ensure that the amended deadlines and associated compliance arrangements are implemented well in advance of the first extended deadline in October 2029.



NORTH AMERICA

[Canada](#)

[Amendments to three Domestic Substances List: SOR/2025-252, SOR/2025-253, and SOR/2025-254 \(in force\)](#)

Canada has adopted three Ministerial Orders amending the Domestic Substances List (DSL) under the Canadian Environmental Protection Act, 1999 (CEPA). The amendments update the list of substances that may be manufactured or

³ The consultation had closed on 8 September 2025.

imported into Canada without being subject to new substance notification requirements, reflecting completed assessments and administrative updates under CEPA. The three orders are:

- » [Order 2025-66-11-01](#) Amending the Domestic Substances List: SOR/2025-252
- » [Order 2025-87-11-01](#) Amending the Domestic Substances List SOR/2025-253
- » [Order 2025-112-11-01](#) Amending the Domestic Substances List: SOR/2025-254

The DSL is a foundational element of Canada’s chemicals management framework. Substances listed on the DSL are considered “existing substances” and are generally exempt from notification under the New Substances Notification Regulations (Chemicals and Polymers).

Each Order amends the Domestic Substances List by:

- » adding substances that have met the criteria for inclusion following assessment under CEPA
- » updating substance identifiers, such as names or CAS Registry Numbers, where applicable

The Orders are made under subsection 66(1) of CEPA and are published in the Canada Gazette, Part II.

The amendments have the following regulatory effects:

- » substances added to the DSL may be manufactured or imported into Canada without prior notification under the New Substances Notification Regulations
- » companies handling these substances are no longer required to submit new substance notifications for activities within the scope of the DSL listing
- » all other applicable federal, provincial, or sector-specific regulatory obligations continue to apply

The three orders do not introduce new risk management measures, restrictions, or compliance obligations beyond the administrative effect of DSL listing. They entered into force on registration in December 2025. The orders provide regulatory certainty for affected substances by formally recognizing them as existing substances under CEPA. There are no penalties associated specifically with these amendments.

Amendments to the PCB Regulations and the Regulations Designating Regulatory Provisions for Purposes of Enforcement (in force)

On 12 December 2025, Canada amended the PCB Regulations and the Regulations Designating Regulatory Provisions for Purposes of Enforcement under the Canadian Environmental Protection Act, 1999 (CEPA) to update and clarify requirements for the management of polychlorinated biphenyls (PCBs). The [amendments](#) revise the definition of PCB, introduce new definitions (including “military equipment”), and clarify how PCB concentrations may be determined without sampling in certain circumstances.

The Regulations establish new and revised conditions for the continued use of PCB-containing equipment, including specific exceptions and control measures for equipment used in nuclear facilities, military applications, and museums. They also strengthen inventory, labeling, reporting, and record-keeping requirements for owners of PCB-containing equipment and adjust timelines for the phase-out of certain legacy electrical equipment, with mechanisms allowing time-limited extensions where phase-out is not technically or economically feasible.

The amendments also update the Regulations Designating Regulatory Provisions for Purposes of Enforcement to ensure that the revised and new PCB-related obligations are subject to CEPA’s enforcement regime. Most provisions entered into force on 12 December 2025, with certain inventory-related sections taking effect six months later.

Prohibition of Certain Toxic Substances Regulations, 2025 (SOR/2025-270) (published)

In December 2025, Canada adopted the [Prohibition of Certain Toxic Substances Regulations, 2025](#) (SOR/2025-270) under the Canadian Environmental Protection Act, 1999. These Regulations repeal and replace the previous 2012 Regulations and introduce updated prohibitions and management measures for a group of chemical substances assessed as toxic, persistent, and harmful to human health and the environment.

The Regulations are intended to support Canada's obligations under the Stockholm Convention on Persistent Organic Pollutants, align national controls with international chemical management commitments, and address risks posed to ecosystems, wildlife, and vulnerable species. They prohibit or significantly restrict listed substances and products containing them, including but not limited to:

- » perfluorooctane sulfonate (PFOS, CAS No. 1763-23-1) and related compounds
- » perfluorooctanoic acid (PFOA, CAS No. 335-67-1) and related compounds
- » long-chain perfluorocarboxylic acids (LC-PFCAs)
- » hexabromocyclododecane (HBCD, CAS No. 25637-99-4; 3194-55-6; 134237-50-6; 134237-51-7; 134237-52-8)
- » polybrominated diphenyl ethers (PBDEs)
- » Dechlorane Plus (DP, CAS No. 13560-89-9)
- » decabromodiphenyl ethane (DBDPE, CAS No. 1163-19-5)
- » short-chain chlorinated alkanes (SCCAs)

Key measures include:

- » general prohibition on manufacture, use, sale, and import of the listed substances and products containing them
- » specified exemptions and time-limited permissions where alternatives are not available
- » incidental presence thresholds, for example concentration limits below which substances may be considered unintentionally present
- » transit exemptions for manufactured items passing through Canada
- » permit system allowing controlled temporary use subject to approval conditions

Permit applications for DP, DBDPE, HBCD, PFOA, and LC-PFCAs (or specific products containing them) will be open for 30 days, from 1 July 2026 to 30 July 2026, the deadline for permit applications.

Penalties for non-compliance include enforcement measures under the Canadian Environmental Protection Act, 1999.

These links provide a [regulation overview](#) and [information on the permit](#).

United States

Final risk evaluation for 1,3-butadiene (published)

EPA [announced](#) the completion of its final TSCA risk evaluation for 1,3-butadiene (CAS No. 106-99-0) and the availability of the [final risk evaluation](#) in the Federal Register. EPA determined that 1,3-butadiene poses unreasonable risk to human health driven by specific conditions of use, with the unreasonable risk determination driven by eleven conditions of use (out of thirty evaluated) based on non-cancer and cancer risks to workers, including one condition of use contributing to unreasonable risk to occupational non-users, primarily from inhalation exposure. EPA designated 1,3-butadiene as a high-priority substance for TSCA risk evaluation on 30 December 2019.

1,3-Butadiene (CASRN 106-99-0), a colorless, flammable gas used in manufacturing polymers like plastic and synthetic rubber, which are used to make products such as car tires, adhesives and sealants, paints and coatings, automotive care products, and lubricants. Consumer products only contain tiny amounts of this chemical (less than 0.001%), which EPA deemed safe for everyday use.

EPA stated it did not find unreasonable risks to the environment, for consumers, or for the general population (including people living near facilities). EPA noted that the worker risk findings do not reflect the use of personal protective equipment (PPE), although PPE may reduce exposures and mitigate risk. As required under TSCA, EPA will now initiate risk management actions and develop a rule to address the unreasonable risks identified, including consideration of health effects, exposure levels, benefits of use, and reasonably ascertainable economic consequences, with opportunities for stakeholder engagement and public comment.

Final Risk Evaluations for butyl benzyl phthalate, dibutyl phthalate, dicyclohexyl phthalate, diethylhexyl phthalate, and diisobutyl phthalate (published)

EPA has released the [final TSCA risk evaluations](#) for butyl benzyl phthalate (CAS 85-68-7), dibutyl phthalate (CAS 84-74-2), dicyclohexyl phthalate (CAS 84-61-7), diethylhexyl phthalate (CAS 117-81-7), and diisobutyl phthalate (CAS 84-69-5) concluding that these substances present unreasonable risks to human health and/or the environment under specific conditions of use.

According to EPA, the evaluations were conducted using the best available science and a weight-of-evidence approach, without consideration of costs or non-risk factors, in accordance with TSCA requirements. Based on these findings, EPA is required to initiate risk management actions to address and mitigate the identified risks.

National Defense Authorization Act for Fiscal Year 2026 (published)

On 18 December 2025, President Donald Trump signed the nearly \$1tn National Defense Authorization Act (NDAA) for Fiscal Year 2026 into law. This annual defense spending bill includes critical provisions that adjust and, in some cases, roll back previous federal restrictions on per- and polyfluoroalkyl substances (PFAS) within military procurement.

The [NDAA](#) serves as the primary legislative vehicle for the U.S. government to manage Department of Defense (DOD) operations. Section 315 of the FY 2026 Act specifically modifies existing mandates to provide the military with greater flexibility in sourcing firefighting equipment and transitioning away from legacy chemical foams.

The key PFAS-related measures included in the FY 2026 NDAA are as follows:

- » Personal protective equipment (PPE) procurement adjustments: Partially rolls back a 2022 restriction that would have banned the purchase of PFAS-containing PPE by 2027. The DOD may now purchase gear meeting the NFPA 1970 standard, which permits PFAS levels below 100 parts per million (ppm).
- » Aqueous film-forming foams (AFFF) phase-out extension: Formally extends the deadline for the DOD to stop using PFAS-based AFFFs to 1 October 2026, allowing more time for the transition to fluorine-free alternatives (F3).
- » Detectable limits: Updates the target for PFAS in military firefighting foams, moving from a fixed 1 ppm limit to a goal of eliminating all "detectable" PFAS.
- » Environmental remediation: Mandates the DOD to develop a PFAS acceleration strategy within 180 days and grants authority to use specialized technologies for chemical destruction and disposal. Specifically, Section 311 now requires the inclusion of detailed information regarding PFAS investigation and remediation activities within the annual report on defense environmental programs.

- » Drinking water provisions: Requires the department to provide alternative water sources to households where supplies are contaminated with PFOS (CAS No. 1763-23-1) or PFOA (CAS No. 335-67-1) due to defense activities.
- » Preference restrictions: Section 312 of the Act eliminates the previous mandatory preference for the DoD to procure motor vehicles using electric or hybrid propulsion systems, which may impact the types of PFAS-containing components (such as batteries and electronics) entering the defense supply chain.

Under the new law, manufacturers and suppliers must ensure that firefighting gear provided to the military complies with the revised NFPA 1970 labeling and concentration standards.

Penalties for non-compliance include the prohibition of contract awards, termination of existing procurement agreements, and potential civil liability for environmental remediation costs under associated federal statutes.

Mandatory Greenhouse Gas Reporting in New York State (published)

The New York State Department of Environmental Conservation (DEC) has mandated annual greenhouse gas (GHG) emissions reporting for entities that emit above specified thresholds. This [regulation](#) primarily targets facilities operating within New York State that combust fuels or engage in processes generating significant GHG emissions. The reporting requirement is effective annually, with submissions due by March 31 for the previous calendar year. The rule aims to enhance transparency and support statewide climate goals under the Climate Leadership and Community Protection Act.

For aerospace and defense manufacturers, this regulation is generally not directly applicable unless operations include large-scale fuel combustion or industrial processes within New York State. Under NYCRR Part 253, DEC treats late or missing reports, under reporting, and recordkeeping failures as separate violations, each accruing per day penalties. Initial violations can range from \$500 to \$18,000 per day, while second or subsequent violations within five years can reach up to \$26,000 per day, with additional daily penalties if the violation continues.

California announces that it will not enforce SB 261 reporting requirements by the original 1 January 2026 deadline (published)

As of 1 December 2025, the California Air Resources Board (CARB) has [confirmed](#) it will not enforce SB 261 reporting requirements by the original 1 January 2026 deadline due to a Ninth Circuit injunction issued on 8 November 2025 (Chamber of Commerce v. Sanchez). The injunction remains in effect pending appellate proceedings, with arguments scheduled for 9 January 2026. CARB will announce a new reporting date after the appeal is resolved. For now, reporting is voluntary, and CARB has opened a docket for submissions. No penalties or enforcement actions will occur at this time. CARB updates and potential future compliance requirements may arise once the court decision is finalized.

Updated Draft Risk Calculation Memorandum for Formaldehyde (consultation)

The U.S. Environmental Protection Agency (EPA) opened a [public consultation](#) on an Updated Draft Risk Calculation Memorandum for formaldehyde (CAS No. 50-00-0) developed under the Toxic Substances Control Act (TSCA). The document updates the scientific approach used to estimate human health risks from acute inhalation exposure to formaldehyde and informs EPA's Revised Draft Risk Evaluation. The update reflects recommendations from multiple peer review bodies and proposes sensory irritation as the most sensitive endpoint for assessing inhalation risks, while maintaining EPA's previous conclusion that formaldehyde presents an unreasonable risk to workers and consumers under

certain conditions of use. EPA is seeking stakeholder input (comments were due on 2 February 2026) on the updated methodology before finalizing the risk evaluation and advancing risk management measures.

Mexico

Draft Mexican Official Standard PROY-NOM-003-SSA1-2025 proposes limits on lead content in paints and related products (consultation)

On 5 January 2026, Mexico's Ministry of Health, through COFEPRIS, published a notice of public consultation on the draft Mexican Official Standard [PROY-NOM-003-SSA1-2025](#) (can also be found [here](#) in Spanish), which proposes a maximum limit of 90 milligrams per kilograms for total lead content and mandatory sanitary labeling requirements for paints and related products.

The draft standard has been approved for consultation by the National Advisory Committee for Standardization of Health Regulation and Promotion. It is designed to reduce health risks associated with lead exposure, particularly for vulnerable populations such as children, and supports Mexico's broader public health policy objectives. The draft would apply nationwide and would be mandatory for all natural and legal persons involved in the manufacture, processing, importation, and commercialization of paints and related products.



OCEANIA

Australia

Updates to the Rolling Action Plan (effective)

In December 2025, the Australian Government published [updates to the Rolling Action Plan](#). The Rolling Action Plan lists the current and recently completed chemical evaluations and is part of the government's approach to protecting human health and the environment. The status for eight evaluation statements has been updated, covering the human health and environmental risks associated with the use of certain chemicals on the Australian Inventory of Industrial Chemicals (Inventory). The eight subjects of evaluation are:

- » azo dyes based on 5-nitro-2-thiazolamine and toluenediamine derivatives (CAS No. 12222-80-9, 15141-18-1, 68516-81-4, 69766-79-6, 70693-64-0, and 72987-42-9)
- » urea, N'-(3,4-dichlorophenyl)-N,N-dimethyl- (Diuron) (CAS No. 330-54-1)
- » zinc (CAS NO. 7440-66-6) and zinc manufacturing by-products (CAS No. 1314-13-2, 7733-02-0, 69011-50-3, 69012-36-8, 69012-43-7, 69012-63-1, 69012-70-0, and 69012-72-2)
- » 2-propenoic acid, 2-methyl-, 1,1'-[(1-methylethylidene)di-4,1-phenylene] ester (bisphenol A dimethacrylate) CAS No 3253-39-2)
- » Chemicals not considered for in depth evaluation – not commercially active in Australia
- » benzoic acid, 2-hydroxy-, 2-ethylhexyl ester (ethylhexyl salicylate) (CAS No. 118-6-5)

- » Chemicals that are unlikely to require further regulation to manage risks to environment
- » Halons listed on the Ozone Protection and Synthetic Greenhouse Gas Management Act 1989 (CAS Nos. 75-63-8, 124-73-2, 353-59-3, and 25497-30-7)

Additionally, the timeframe for completing the evaluation of phenol, [4,4'-thiobis\[2-\(1,1-dimethylethyl\)-5-methyl\]-](#) (CAS No. not available) on the Rolling Action Plan has been extended; the updated end date is 30 June 2026.

There are no penalties associated with this update.

Chemical added to the Australian Industrial Chemicals Introduction Scheme inventory and correction of chemical names (effective)

The Australian Government published three additions to the AICIS (Australian Industrial Chemicals Introduction Scheme) inventory on 9 December 2025, [batch 1](#) and [batch 2](#), and on [15 December 2025](#). The AICIS Inventory, or the Australian Inventory of Industrial Chemicals, is an online database that lists industrial chemicals available for use in Australia. It serves as a resource for importers and manufacturers to determine if a chemical is already listed and subject to AICIS regulations.

The chemicals added to the inventory are:

- » 1,4-benzenedicarboxylic acid, polymer with 1,2-ethanediol and .alpha.-hydro-.omega.-hydroxypoly(oxy-1,4-butanediyl) (CAS No. 900151-37-3) – added under Section 82 of the Industrial Chemicals Act 2019, as five years have passed since the assessment certificates for the industrial chemicals were issued
- » benzoic acid, 2-hydroxy-, 2-methylpentyl ester (CAS No. 98969-19-8) – added under Section 83 of the Industrial Act 2019, as the assessment certificate does not include a condition of a kind mentioned in paragraph 38(2)(c)

Additionally, a number of chemicals have had their names updated on the Inventory.

Under the conditions of the addition of these chemicals, there is an obligation for manufacturers and importers to notify the authorities within 28 days if the circumstances of said import or manufacture are different to those outlined in the assessments for a given substance.

Penalties for non-compliance include fines.

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 1 – 2026*



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