Newsletter

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

IAEG

Vol.6, Issue 2

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 2 – 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

New Hazardous Waste Exclusions Management List (in effect)

On 9 January 2026, China's Ministry of Ecology and Environment (MEE) published a new Hazardous Waste Exclusion Management List (can also be found here in Chinese), replacing the previous 2021 list. MEE believes this would improve how hazardous waste is identified and would promote proper management of different hierarchies of hazardous waste, in accordance with the Law of the People's Republic of China on the Prevention and Control of Environmental Pollution by Solid Waste. Solid waste that meets the criteria stated in the list is not considered hazardous waste. The list is subject to adjustments based on circumstances. This list replaces and repeals the 2021 list and comes into effect immediately following publication.

No penalties are associated with this update.

Third batch of recommended group standards for carbon footprint accounting rules of industrial products (published)

China's Ministry of Industry and Information Technology (MIIT) released a third batch of recommended group standards for industrial product carbon footprint accounting (can also be found here in Chinese). The update introduces seventy-three standards intended to standardize the calculation and recording of carbon footprints for industrial products. The announcement includes an annex listing seventy-three product-specific group standards, each specifying a product type and a corresponding standard number, covering sectors such as chemicals and basic materials, construction products, automotive and transport equipment, electrical and electronic equipment, textiles, packaging, and photovoltaic products. The organizations producing the listed products should review the relevant methods and consider how well their existing data and reporting systems align with the new frameworks.

There are no penalties associated with this update.

Requirement to submit the 2025 annual activity reports for registered new chemical substances (published)

On 12 January 2026, China's Solid Waste and Chemicals Management Centre (SCC) issued a notice requiring the submission of annual activity reports for registered new chemical substances covering activities in 2025. The notice reinforces existing reporting obligations under China's new chemical environmental management regime.

The notice implements reporting requirements under the Measures for the Registration of Environmental Management of New Chemical Substances (MEE Order No. 12)[1]. It does not introduce new regulatory instruments, annexes, or substance

[1] MEE = Ministry of Ecology and Environment

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lists, but operates within the existing registration and reporting framework. An attachment to the notice identifies the relevant registration certificate holders subject to reporting.

The reporting obligation applies to:

- holders of regular registration certificates issued under former MEP Order No. 7 (which has been replaced by MEE Order No. 12) where the registered new chemical substances fall under the priority environmental management category specified in Article 3 of that order
- holders of regular registration certificates issued under MEE Order No. 12 where the certificate explicitly requires annual reporting

Affected companies must submit a 2025 annual activity report detailing actual production or import volumes, environmental releases, information transmitted to downstream users, and the implementation status of environmental risk control measures and other management requirements. Reports must be submitted online via the MEE new chemical registration system by the registration certificate holder or an authorized agent, with both electronic and signed PDF versions required.

This notice reiterates and enforces existing annual reporting obligations for certain registered new chemical substances. Reports must be submitted by 30 April 2026. The notice does not introduce new compliance obligations beyond those already established under the applicable registration certificates.

Penalties for non-compliance are governed by the existing enforcement provisions of China's new chemical environmental management legislation. More information can be found here in Chinese.

Solicitation of opinions on standards regarding electric commercial vehicle battery swapping systems, telecommunications infrastructure sharing, and autonomous driving testing scenarios (consultation)

China's Ministry of Industry and Information Technology has launched a consultation on proposed standardization projects, including thirty-seven industry standards, twenty foreign-language versions of industry standards, and twelve recommended national standards. The consultation seeks feedback (comments due on 7 March 2026) before the formal initiation of these standard development projects.

The proposed projects cover a range of industrial and technology areas, including electric commercial vehicle battery swapping systems, telecommunications infrastructure sharing, and autonomous driving testing scenarios. The consultation forms part of China's standardization planning process.

More information can be found here in Chinese.

Addition of five substances to the Catalogue of Hazardous Chemicals (consultation)

The Ministry of Emergency Management (MEM), with other relevant departments, published an announcement on 21 January 2026 opening a consultation on the addition of five new substances to the Catalogue of Hazardous Chemicals (comments were due on 21 February 2026). From the moment of adding the substances to the Catalogue, all entities interested in using them in production, distribution, or import will be required to obtain a HazChem license under the country's new Hazardous Chemicals Safety Law.

The five substances are:

- 3-chloropropyne (CAS No. 624-65-7)
- 2-iodoxybenzoic acid (CAS No. 61717-82-6)
- 4-nitrobenzyl 2-diazoacetoacetate (CAS No. 82551-63-1)
- methanesulfonyl azide (CAS No. 1516-70-7)
- 3-methyl-2-nitrobenzoic acid (CAS No. 5437-38-7)

More information can be found in Chinese in this announcement from MEM. The catalogue of hazardous chemicals can be found here in Chinese.

Japan

Addition of 167 items to the List of New Chemical Substances (published)

The Industrial Safety and Health Act implements the Globally Harmonized System of Classification and Labeling of Chemicals in Japan. It outlines requirements for labeling and Safety Data Sheets for hazardous substances. Substances on the list of newly announced chemical substances under the Act do not require manufacturers and importers to notify the Ministry of Health, Labor, and Welfare about production or import. The latest update on 26 December 2025 added 167 substances to the list.

More information in Japanese can be found in these links on the new substances list and the procedures for new chemical substances.

Partial revision to the guidance on the labeling of container and packages under the Poisons and Deleterious Substances Control Act (effective)

On 5 January 2026, Japan's Ministry of Health, Labor and Welfare (MHLW) issued a partial revision (can also be found here in Chinese) to the guidance on the labeling of containers and packages and the provision of Safety Data Sheets (SDSs) for poisonous and deleterious substances under the Poisonous and Deleterious Substances Control Act (the Act). This revision aims to improve clarity, consistency, and technical accuracy in Japan's chemical labeling and SDS guidance for poisonous and deleterious substances. It does not change the underlying regulatory framework but may necessitate administrative updates to documentation practices.

The revision:

- updates an existing notification issued in 2012 and forms part of Japan's broader efforts to maintain alignment with internationally harmonized chemical classification and communication standards
- revises the definitions, terminology, and explanatory notes within the guidance, including references to hazard classification, labeling elements, and SDS content
- updates terminology to better align with GHS concepts and corrects headings, formatting, cross-references, and explanatory text, including clarification of the information to be provided in SDSs in areas such as storage conditions, physical and chemical properties, stability and reactivity, and disposal or recycling considerations
- does not introduce new annexes or standalone tables
- does not introduce new substance prohibitions, exposure limits, or hazard classifications, but instead clarifies and refines existing chemical hazard communication requirements

While these requirements existed prior to the revision, companies may need to review and update labeling and SDS documentation to ensure consistency with the clarified guidance.

The revision entered into force on 5 January 2026. There are no new penalties associated with this update beyond those already applicable under the Act.

Substances newly designated as targets for elimination at the 12th Conference of the Parties to the Stockholm Convention will be designated as Class I Specified Chemical Substances under the Chemical Substances Control Law (draft)

Japan has announced plans (can also be found here in Japanese) to designate several chemicals newly listed for elimination under the Stockholm Convention as Class I Specified Chemical Substances under the Chemical Substances Control Law (CSCL). The substances include chlorpyrifos (CAS No. 2921-88-2), medium-chain chlorinated paraffins (MCCPs), long-chain perfluoroalkyl carboxylic acids (PFCAs) and their salts, and PFCA-related substances. The initiative aims to align Japan's domestic chemical management requirements with international obligations under the Stockholm Convention. The proposal follows deliberations by the Chemical Substances Council and related subcommittees, which concluded that regulatory measures are required for these substances due to their persistence and environmental and human health risks.

The draft update involves amendments to the CSCL enforcement order and related ministerial ordinances. The update will:

- designate the specified chemicals as Class I Specified Chemical Substances under CSCL
- establish prohibitions on manufacture, import and use
- identify specific products containing these substances that will be prohibited from import
- introduce technical standards applicable to products containing these substances

Once designated as Class I Specified Chemical Substances, the chemicals will be subject to strict regulatory controls under CSCL, including prohibition on manufacture, import, and use. The prohibitions will apply broadly across industrial and commercial activities, except for limited exemptions for research and testing purposes under CSCL Articles 18, 22 and 25. The designation will also introduce import restrictions for products containing the listed substances. Examples of affected applications include:

- wood insect repellents containing chlorpyrifos
- plasticizers, flame retardant additives, lubricants, paints, adhesives, sealants, and fiber protection agents containing MCCPs
- photographic films, lubricants, paints, water- and oil-repellent treatments, adhesives, fire-extinguishing agents, waxes, treated fabrics, treated clothing, and treated floor coverings containing long-chain PFCAs or related substances

Additionally, use restrictions may apply where businesses manufacture other chemical substances or products using the designated chemicals. However, the regulations do not apply to product "use" where the handled item is legally treated as a finished product rather than a chemical substance under CSCL implementation guidance.

Japan plans to amend its CSCL framework to designate chlorpyrifos, MCCPs, long-chain PFCAs, their salts and related substances as Class I Specified Chemical Substances to align with the Stockholm Convention. Public consultation began in January 2026, with promulgation of the revised Cabinet Order expected in spring 2026 and associated ministerial ordinances anticipated from summer 2026. Implementation of the measures is currently expected around autumn 2026 and will introduce prohibitions on the manufacture, import, and use of the listed substances, with limited exemptions for research and testing.

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Regulating or banning perfluorohexanesulfonic acid and related substances (consultation)

On 21 January 2026, three Japanese government ministries opened a consultation (can also be found here in Japanese) on the specific list of chemicals to be banned or regulated as perfluorohexanesulfonic acid (PFHxS; CAS No. 355-46-4) and PFHxS-related substances. This will be used to amend the Chemical Substances Control Law (CSCL), fulfilling obligations under Cabinet Order No. 416 of 2025 as well as international obligations under the Stockholm Convention. The consultation closed on 19 February 2026.

Cabinet Order No. 416 of 2025 classified PFHxS and its related substances as Class I Specified Chemical Substances under the CSCL but did not include a specific list of substances. This consultation proposes a list of 117 specific PFHxS-related substances in the following categories:

- metal and ammonium salts and related sulfonamides
- halides and amide derivatives
- acrylate and methacrylate copolymers
- complex reaction products

Substances regulated as Class I Specified Chemical Substances are banned from use, manufacture, and import with very few exceptions if government permission is given. The ban on imports extends to products containing these substances. These substances are considered to be persistent, highly bioaccumulative, and possessing long-term toxicity to humans or higher-level predators.

Singapore

Restrictions on chlorpyrifos, certain medium-chain chlorinated paraffins, and certain long-chain perfluorocarboxylic acids in accordance with the Stockholm Convention (in force)

On 16 December 2025, the Depositary Notification was officially communicated to the Stockholm Convention Parties as announced in Circular No: NEA/HS/6.6/SC02. The Stockholm Convention aims to eliminate and/or restrict the production and use of Persistent Organic Pollutants. The Conference of the Parties held in April/May 2025 added certain chemicals to Annex A of the Convention for elimination. This means their manufacture, import and export are prohibited, which also applies to products containing these chemicals.

Singapore is a Party to the Convention, and the amendments will come into force on 16 December 2026. Existing stock of chemicals and/or their products can still be depleted after this date. Singapore's National Environment Agency is reviewing the relevance of the exemptions for certain specific uses to local industry, which will be communicated later. Chemicals under scope are:

- chlorpyrifos (CAS No. 2921-88-2)
- medium-chain chlorinated paraffins with chain lengths at least C14 but not exceeding C17 and chlorination levels ≥ 45% chlorine by weight
- long-chain perfluorocarboxylic acids with chain lengths at least C9 but not exceeding C21, their salts and related compounds (LC-PFCAs)

Annex A contains a List of Harmonized System and Product Codes. These should be used by traders to declare their import and export TradeNet permit applications.

Turkey

Framework regulation on Ecodesign requirements for sustainable products (draft)

Turkey has published a draft framework regulation that closely mirrors the European Union's (EU's) Ecodesign for Sustainable Products Regulation (ESPR), as part of its ongoing efforts to align national legislation with the EU under the customs union. The draft was notified to the World Trade Organization (WTO) on 22 January 2026 and is intended to establish sustainability-related product requirements for goods placed on the Turkish market, including obligations linked to substances of concern. The initiative reflects Turkey's broader legislative harmonization with EU product sustainability and market surveillance frameworks.

The regulation would apply to physical products placed on the Turkish market, including components and intermediate products. Specific exclusions set out for certain product categories include food and feed, medicinal products for human and veterinary use, live plants, animals and microorganisms, products of human origin, plant and animal products intended for reproduction, and certain regulated vehicles.

The draft regulation introduces general sustainability and information obligations aligned with the EU ESPR framework. It establishes rules to prevent the destruction of unsold consumer products and introduces obligations related to substances of concern. The requirements affect manufacturers, importers and distributors placing physical products on the Turkish market.

The draft regulation is subject to a WTO consultation period ending on 23 March 2026. It will enter into force upon its official publication, with key compliance deadlines applying from 19 July 2026 for large enterprises and from 19 July 2030 for medium-sized enterprises.

EUROPE

European Union

Committees for Risk Assessment and Socio-Economic Analysis meetings regarding restrictions on per- and polyfluoroalkyl substances (published)

On 17 December 2025, the Committees for Risk Assessment (RAC) and Socio-Economic Analysis (SEAC) announced that they had reached provisional conclusions for various manufacturing sectors and specific horizontal issues. This update serves to inform stakeholders of the evaluation progress and prepare them for the upcoming consultation on the SEAC draft opinion. The restriction proposal aims to address the risks posed by the manufacture, placing on the market, and use of per- and polyfluoroalkyl substances (PFAS) across the European Economic Area, with the final consolidated opinion expected to form the basis of a European Commission legislative proposal by the end of 2026.

RAC and SEAC have finalized their reviews of PFAS manufacturing, and fourteen specific sectors covered by the EU-wide PFAS restriction proposal. During December 2025 meetings, they concluded discussions on these as well as horizontal issues

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impacting all sectors, such as defining concentration limits, hazard assessments, recycling, risk management measures, and enforceability. In addition, SEAC has concluded its evaluation of the electronics and semiconductor sectors.

The announcement page includes links to guidance for respondents, which includes PFAS-mapping to sectors, applications, and uses. For the upcoming consultation, stakeholders will be required to provide information via two survey types: 1) Sector-specific surveys for the fourteen sectors specifically evaluated and 2) a general survey for sectors not specifically evaluated. Respondents must provide data on the availability of alternatives, socioeconomic impacts including profit and employment losses, and the costs of implementing risk management measures.

RAC expects to adopt its final opinion in March 2026, while SEAC will agree on its draft opinion at the same time. A 60-day stakeholder consultation on SEAC's draft opinion will commence shortly after the March 2026 agreement. SEAC expects to adopt its final opinion by the end of 2026.

There are no penalties associated with this update.

Addition of n-hexane and bisphenol AF and its salts to the Candidate List of substances of very high concern (effective)

On 4 February 2026, the European Chemicals Agency (ECHA) announced the addition of n-hexane (EC No. 203-777-6; CAS No. 110-54-3) and 4,4'-[2,2,2-trifluoro-1-(trifluoromethyl)ethylidene]diphenol (Bisphenol AF; EC No. 216-036-7; CAS No. 1478-61-1) and its salts to the REACH Candidate List of substances of very high concern (SVHCs). The candidate list is a key mechanism under the EU REACH Regulation, flagging substances of significant concern that may subsequently be prioritized for inclusion in the Authorization List, under which continued use would be prohibited unless companies obtain specific authorization from the European Commission.

N-hexane was identified as an SVHC due to specific target organ toxicity after repeated exposure, meeting the criteria of Article 57(f) (human health), reflecting concerns over long-term neurotoxic effects. Example of use include formulation, polymer processing, coatings, and cleaning agent. Bisphenol AF and its salts were identified due to being toxic for reproduction, in accordance with Article 57(c) of REACH. The substances can be used as process regulator and cross-linking agents.

The inclusion of these substances triggers immediate legal obligations for manufacturers, importers, and suppliers under REACH and the Waste Framework Directive. If an article contains these substances above a concentration of 0.1% (weight by weight), suppliers must provide safety information to customers and consumers, and producers or importers must notify ECHA within six months. Furthermore, European Union (EU) and European Economic Area suppliers must update Safety Data Sheets (SDS) for substances supplied on their own or in mixtures. Companies must submit notifications to the SCIP database for articles containing the substances >0.1% w/w. Products containing these SVHCs are ineligible for the EU Ecolabel.

The Candidate List inclusion applies from 4 February 2026, with the specific deadline for notifying ECHA of articles containing these substances falling six months later. Penalties for non-compliance with EU REACH are determined by Member States.

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Restriction proposal on certain non-polymeric aromatic brominated flame retardants (consultation)

On 18 December 2024, the European Chemicals Agency (ECHA) published a report, concluding that non-polymeric additive aromatic brominated flame retardants (ABFRs) have PBT (persistent, bioaccumulative, toxic) or vPvB (very persistent, very bioaccumulative) properties. To prepare an Annex XV restriction dossier on certain non-polymeric ABFRs, ECHA is opening a consultation period to submit evidence on three restriction options (comment due on 18 March 2026).

This call for evidence aims to support the preparation of the restriction dossier by collecting information on:

- stakeholders' reactions to the restriction options under consideration by ECHA
- compliance costs of the restriction options and other economic impacts
- information on alternatives (e.g., on their technical and economic feasibility)
- other impacts (e.g., on employment, on trade, impacts on production processes and products' quality, etc.)

The list of affected substances can be found in this background document.

Harmonized classification and labeling consultation for medium-chain ortho-phthalates, butane-1,4-diol, and prohexadione-calciumigations (consultation)

The European Chemicals Agency issued three evidence calls to update Annexes to the Classification, Labeling, and Packaging (CLP) Regulation. The CLP Regulation is a European Union regulation that ensures chemical hazards are clearly communicated to workers and consumers.

Call 1 concerns harmonized classification for medium-chain ortho-phthalates via a grouping/category approach due to its toxicity to reproduction and endocrine disruption. The substances of interest are mono- and di-ortho-phthalate esters with at least one of the following:

- a linear or branched alkyl moiety with a C4-C6 backbone[2] with possible substitution by methyl and/or ethyl groups
- a benzyl moiety with methylene possibly substituted by methyl and/or ethyl groups
- a cyclopentyl or cyclohexyl moiety with possible substitution by methyl and/or ethyl groups

Modifications for substances with an existing entry in Annex VI of CLP:

- Group A (proposed new classification is Repr. 1B, H360D, ED HH 1, EUH380, ED ENV 1, EUH430):
  - 1,2-benzenedicarboxylic acid, dipentyl ester, branched and linear (EC No. 284-032-2; CAS No. 84777-06-0)
  - n-pentyl-isopentyl phthalate (EC and CAS Nos. not available)
  - di-n-pentyl phthalate (EC No. 205-017-9; CAS No. 131-18-0)
  - diisopentyl phthalate (EC No. 210-88-4; CAS No. 605-50-5)
- Group B (for proposed new classification see registry of CLH intentions for individual entries):
  - diisohexyl phthalate (EC No. 276-090-2; CAS No. 71850-09-4)
  - dihexyl phthalate (EC No. 201-559-5; CAS No. 84-75-3)
  - benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich (EC No. 276-158-1; CAS No. 71888-89-6)
  - benzenedicarboxylic acid, dihexyl ester, branched and linear (EC No. 271-093-5; CAS No. 68515-50-4)
  - diisooctyl phthalate (EC No. 248-523-5; CAS No. 27554-26-3)
  - dibutyl phthalate; [DBP] (EC No. 201-557-4; CAS No. 84-74-2)
  - benzyl butyl phthalate; [BBP] (EC No. 201-622-7; CAS No. 85-68-7)

[2] The backbone is defined as the longest linear carbon chain from the ester function.

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- dicyclohexyl phthalate (EC No. 201-545-9; CAS No. 84-61-7)
- bis(2-ethylhexyl) phthalate; di-(2-ethylhexyl) phthalate; [DEHP] (EC No. 204-211-0; CAS No. 117-81-7)

Call 2 concerns harmonized classification for butane-1,4-diol (EC No. 203-786-5; CAS No. 110-63-4) due to its acute toxicity (harmful when swallowed). The action is needed to regulate implementation of self-classification. While the industrial use of the chemical is safe, misuse for personal purposes is reported frequently. The proposed new classification is:

- Acute Tox. 4, H302
- STOT SE 3, H336
- Oral: ATE = 1350 milligrams per kilogram

Call 3 concerns prohexadione-calcium (ISO); calcium 3-oxido-5-oxo-4-propionylcyclohex-3-ene-1-carboxylate (EC No. not available; CAS No. 127277-53-6) due to its hazard properties being updated during renewal assessment under other regulation. The proposed new classification is:

- Skin Sens. 1B, H317
- Repr. 2, H361d
- STOT RE 2, H373
- Aquatic Acute 1, H400, M-factor=1
- Aquatic Chronic 1, H410, M-factor=1

If these proposed new classifications are approved, new labeling and packaging requirements might apply.

Amendments to REACH to include substances recently classified as category 1A or 1B carcinogens, germ cell mutagens, or reproductive toxicants in Annex XVII (draft)

On 19 January 2026, the European Commission (EC) published a draft proposal to amend Regulation (EC) No 1907/2006 (REACH) to include substances recently classified as category 1A or 1B carcinogens, germ cell mutagens or reproductive toxicants (CMRs) in Annex XVII of the Regulation. Under Regulation (EC) No 1272/2008 on the classification, labeling and packaging (CLP) of substances and mixtures, several substances have recently been classified as CMR category 1A or 1B. The draft proposal seeks to add these substances to Annex XVII of REACH, which lists hazardous chemicals restricted from being used and placed on the market to limit public access. REACH is the framework governing the registration, use and restriction of chemical substances in the European Union (EU).

The draft further proposes the application of additivity rules for these substances, whereby the sum of the concentration of these substances in a mixture would be used to determine if the mixture surpasses limit values rather than individual substance concentrations. However, the draft proposes to apply an exception to nitrous oxide (EC No. 233-032-0; CAS No. 10024-97-2), allowing it to continue being sold and used as a food additive (e.g., as a propellant used in whipped cream spray cans) though restricted under REACH.

This draft is proposed to be adopted in the first quarter of 2026 and is proposed to enter into force 20 days after it is published in the Official Journal of the EU. There is consultation period for making comments on this draft for up to 60 days following its notification, ending on 20 March 2026.

Harmonized classification and labeling for N-ethyl-N-[2-[1-(2-methylpropoxy)ethoxy] ethyl]-4-(phenylazo)aniline (consultation)

The European Chemicals Agency (ECHA) has opened a public consultation on a proposal for harmonized classification and labeling (CLH) of N-ethyl-N-[2-[1-(2-methylpropoxy)ethoxy]ethyl]-4-(phenylazo)aniline (EC No. 252-021-1; CAS No. 34432-

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92-3), submitted by Belgium under the CLP Regulation[3]. The consultation covers proposed hazard classifications including Acute Tox. 4, H302 (with an oral ATE of 500 milligrams per kilogram), Skin Sens. 1B, H317, Repr. 1B, H360D, and STOT RE 2, H373 (affecting the blood and nervous systems).

This allows stakeholders to comment on the classification proposal, supporting data and hazard assessment regarding acute oral toxicity, skin sensitization, reproductive toxicity, and specific target organ toxicity following repeated exposure. The consultation began on 16 February 2026, and comments may be submitted until 17 April 2026.

Post-2030 climate policy framework (consultation)

On 9 February 2026, the European Commission launched two open public consultations and calls for evidence to prepare the European Union (EU) climate policy framework for the period after 2030, focusing on the role of national climate targets and flexibilities and on the possible use of international credits. The Commission stated that the consultations will inform legislative proposals due in the last quarter of 2026, and that both consultations remain open until 4 May 2026.

For national climate targets and flexibilities, the update explains that national targets under the Effort Sharing and LULUCF Regulations will expire in 2030 and that the consultation will assess the role of national targets and flexibilities in the EU climate policy after 2030, including the role of carbon removals and ways to provide flexibility and EU support. The update also notes the Commission's July 2025 proposal to amend the European Climate Law to set a legally binding 2040 target and the December 2025 provisional agreement by the European Parliament and the Council endorsing this target.

For international credits, the update states that the agreement on the European Climate Law includes the possibility to use high-quality international credits towards the 2040 target starting from 2036, potentially up to 5% of 1990 EU net emissions, and that there may be a pilot period between 2031 and 2035 to help initiate a high-quality international carbon credit market. The update also notes that there is an ongoing public consultation and call for evidence for the upcoming revision of the Governance Regulation.

First voluntary certification methodologies for activities that permanently remove carbon dioxide from the atmosphere (adopted)

On 3 February 2026, under the Carbon Removals and Carbon Farming framework established by Regulation (EU) 2024/3012, the European Commission adopted the first voluntary certification methodologies for activities that permanently remove CO_2 from the atmosphere, with the stated aims of setting clear rules, supporting climate innovation and investment, and addressing greenwashing. The methodologies cover three types of permanent carbon removal activities: direct air capture with carbon storage, biogenic emissions capture with carbon storage, and biochar carbon removal. The Commission stated that projects using these approaches can start applying for European Union certification.

The Commission stated that the methodologies define what counts as a tonne of removal, how permanence must be ensured, and how key risks such as leakages and liabilities are addressed. Next steps described in the update are that the delegated regulation will be transmitted to the European Parliament and the Council for a two-month scrutiny period, which may be extended by a further two months. In the absence of objections, it is expected to be published in the Official Journal in early April 2026, with entry into force 20 days thereafter.

[3] CLP = classification, labeling, and packaging.

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Luxembourg

Amendments to Annex A of the Stockholm Convention on Persistent Organic Pollutants regarding methoxychlor and Dechlorane Plus take effect (in force)

On 5 February 2026, Luxembourg published the Amendments to Annex A of the Stockholm Convention on Persistent Organic Pollutants that were adopted under Decisions SC-11/9 and SC-11/10 at the eleventh meeting of the Conference of the Parties held in Geneva from 1 to 12 May 2023 and entered into force on 26 February 2025 in the Luxembourg Official Journal of the Grand Duchy of Luxembourg to take effect.

Decision SC-11/9 lists methoxychlor in Part I of Annex A without specific exemptions for production and use. The annex describes methoxychlor as covering all possible isomers of dimethoxydiphenyltrichloroethane and any combinations of these, and provides example CAS No.: 72-43-5, 30667-99-3, 76733-77-2, 255065-25-9, 255065-26-0, 59424-81-6, 1348358-72-4.

Decision SC-11/10 lists Dechlorane Plus in Part I of Annex A and states that Dechlorane Plus includes its syn and anti-isomers. The annex provides CAS No. 13560-89-9 for Dechlorane Plus, and CAS Nos. 135821-03-3 and 135821-74-8 for the syn and anti-isomers. The decision sets no specific exemption for production and provides specific exemptions for use in accordance with a new Part XI of Annex A, including aerospace, space and defense applications and medical imaging and radiotherapy equipment, as set out in the annex. Part XI also sets conditions and time limits for specific exemptions for use in spare parts and supplies for repair of certain articles, including a limit of up to 2044 for the listed sectors or the end of the useful life of the articles, whichever occurs earlier, and a review by the Conference of the Parties no later than 2041 for certain medical and in vitro diagnostic device related repair exemptions.

Penalties are not mentioned in the update. More information can be found in French in this announcement from the Journal Officiel du Grand-Duché de Luxembourg.

Netherlands

Announcement of amendment to Annex A of the Stockholm Convention on the listing of UV-328 (published)

On 1 February 2026, the Netherland Ministerie van Buitenlandse Zaken published SC-12/14 that amended Annex A of the Stockholm Convention on Persistent Organic Pollutants (with Appendices) issued in Stockholm on 22 May 2001 to take effect. SC-12/14 consists of Sections A to D and G. SC-12/14 had added a new specific exemption in part I of Annex A of the Stockholm Convention on Persistent Organic Pollutants for the substance UV-328 when it is used in:

- waterproof tape for insulation blankets and floors in aircraft
- polyurethane and polyamide adhesives and coatings
- structural, mechanical, internal, and electrical assemblies and emergency, propulsion, environmental and flight control systems in aircraft

In part XII of Annex A of the Convention, SC-12/14 sets a deadline for the exemption added to part I. This exemption will expire by 2030 at the latest. SC-12/14 will enter into force on 9 October 2026. Penalties are not provided for this update. Nore information can be found here in Dutch.

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Romania

Decision no. 40/2026 regarding lead and is inorganic compounds and diisocyanates (effective)

On 3 February 2026, Decision no. 40/2026 was published to transpose Directive (EU) 2024/869 (regarding the limit values for lead and its inorganic compounds and for diisocyanates) into national regulations. Decision no. 40/2026 broadens the scope of worker protection regulations in Romania and establishes new exposure limits. Amendments to Government Decision No. 1,093/2006 include:

- alignment of definition of mutagens with Regulation (EC) no. 1272/2008 (EU CLP Regulation)
- inclusion of substances that are toxic for reproduction

Amendments to Government Decision No. 1,218/2006 on establishing the minimum occupational health and safety requirements to ensure the protection of workers against risks related to the presence of chemical agents include the following:

- spray painting with lead oxide is prohibited
- diisocyanates added to Annex I with an 8-hour limit of 0.006 milligram per cubic meter (mg/m^3) and a short-term limit (STEL) of 0.012 mg/m^3 (transitional limits of 0.010 mg/m^3 and 0.020 mg/m^3 apply until 31 December 2028)
- numbers 319, 362 and 516 are repealed from Annex I
- lead entry in Annex I is modified to reduce the binding occupational exposure limit to 0.03 mg/m^3
- limit values for lead:
  - until 31 December 2028, the mandatory biological limit value for lead is 30 micrograms (µg) Pb/100 milliliter (ml) of blood
  - for those whose exposure occurred before 9 April 2026, and blood lead level is less than 70 µg Pb/100 ml of blood, medical surveillance shall be carried out periodically
  - from 1 January 2029, the mandatory biological limit value is 15 µg Pb/100 ml of blood
  - medical surveillance is now mandatory if air concentration exceeds 0.015 mg/m^3 or blood levels exceed 9 µg Pb/100 ml

Government Decision No. 40/2026 was adopted on 30 January 2026 and entered into force immediately upon its publication in the Official Gazette on 3 February 2026. Specific transitional periods regarding the limit values for diisocyanates and biological limits for lead apply until 31 December 2028. There are no penalties associated with this update.

More information can be found in Romania in this announcement from the Guvernul României.

Switzerland

Restrictions on per- and polyfluoroalkyl substances, long-chain perfluorocarboxylic acids, medium-chain chlorinated paraffins, mercury, and chlorpyrifos (consultation)

Switzerland has proposed an amendment (can also be found here in German) to its Chemical Risk Reduction Ordinance (ChemRRV) to tighten controls on persistent hazardous chemicals, including per- and polyfluoroalkyl substances (PFAS), long-chain perfluorocarboxylic acids (LC-PFCAs), medium-chain chlorinated paraffins (MCCPs), mercury, and chlorpyrifos. Published on 22 December, the draft aims to align Swiss chemicals legislation with recent European Union (EU) measures and ensure compliance with Switzerland's obligations under the Stockholm Convention on Persistent Organic Pollutants (POPs) and the Minamata Convention on Mercury, as part of efforts to reduce risks to human health and the environment.

The proposal takes the form of an amendment to the existing ChemRRV. It introduces new prohibitions and updated limit values within the ordinance framework, affecting existing substance provisions governing the manufacture, placing on the market, use and export of regulated chemicals. The draft amendment would prohibit the placing on the market, use and export of firefighting foams containing PFAS above 1 part per million, aligning Swiss requirements with the EU restriction. It would also align Swiss law with the EU maximum permissible contamination levels for perfluorooctane sulfonic acid (PFOS), its salts and related compounds in substances and mixtures.

The proposal would further ban the manufacturing, placing on the market, and use of LC-PFCAs and MCCPs following their listing under the Stockholm Convention, with temporary exemptions and transitional timelines applied in line with EU practice. In addition, the amendment restricts the placing on the market and use of specific mercury-containing products, including switches, relays, pressure sensors, vacuum pumps, balancing weights for wheels and tires, photographic materials, and certain specialized applications such as propellants for satellites and spacecraft. Exemptions are provided for spare parts for permitted equipment, large tools, and installations, analytical and research uses, and certain space applications. The amendment also links export restrictions to market eligibility and prohibits the use of mercury in the manufacture of lamps unless the resulting products are permitted under the applicable annex provisions.

The proposed amendment represents a tightening of Swiss chemical controls for PFAS, POPs and mercury, aligning national legislation with EU measures and international conventions. A public consultation organized by the Federal Office for the Environment is open until 12 April 2026. The entry into force date is 1 December 2026, with specific changes entering into force on 1 June 2027 and 1 August 2027.

United Kingdom

Per- and Polyfluoroalkyl Substances Plan (published)

On 3 February 2026, the United Kingdom (UK) published the per- and polyfluoroalkyl substances (PFAS) Plan, delivering on the Environmental Improvement Plan 2025 commitment. The document sets out a plan to reduce the harmful effects of these PFAS, while supporting the transition to safer alternatives. The plan acknowledges that while PFAS are essential for critical sectors (e.g., medical devices, clean energy, defense), their high persistence and mobility pose long-term environmental and health risks. The strategy adopts a "science-led" and "proportionate" approach, balancing risk mitigation with the need to support economic growth and maintain essential applications where no viable alternatives exist.

The plan is organized into three sections:

- Understanding PFAS sources
  - expansion of monitoring (water/soils)
  - new research (ultra-short-chain PFAS/fluoropolymers)
  - consideration of adding further PFAS to the UK Pollutant Release and Transfer Register (PRTR).
- Tackling PFAS pathways:
  - reduction of emissions over the lifecycle
  - continuous implementation of global bans (Stockholm Convention)
  - development of guidance for operators on handling and disposal
  - assessing international fee models
  - restrictions of PFAS in firefighting foams.
- Reducing ongoing exposure to PFAS:
  - guidance to address legacy PFAS pollution

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- testing of food contact materials
- consultation on statutory limits for PFAS in drinking water.

The plan also sets a timeline for regulatory actions, including prohibiting long-chain PFCAs by late 2026 and deciding on firefighting foam restrictions by 2027, while maintaining exemptions for critical uses like medical devices.

Plans to reform UK REACH framework to accelerate regulation of chemical substances and backlog of European Union candidate list (draft)

The United Kingdom (UK) has announced plans to reform the UK REACH framework to accelerate the regulation of chemical substances including per- and polyfluoroalkyl substances (PFAS) and address the backlog of the European Union (EU) candidate list, authorization and restriction measures not yet reflected in UK legislation since Brexit. The reform aims to enable faster alignment with EU REACH decisions while maintaining the ability for the UK to diverge where considered appropriate, and would likely affect manufacturers, importers and downstream users placing substances and mixtures on the UK market.

The proposed reform would introduce a revised decision-making framework intended to enable faster incorporation of EU REACH regulatory outcomes into UK REACH while retaining domestic decision-making control. The approach has been described as broadly comparable to the Swiss model, under which EU measures may be mirrored more quickly but retaining the option to diverge. Further structural details are expected following pre-consultation work and a formal consultation process.

No immediate regulatory requirements or substance-specific restrictions are introduced. However, the reform is expected to shorten timelines for adding substances to the UK REACH candidate list, authorization list, and restriction processes, including substances such as PFAS currently under regulatory consideration. Restrictions have been identified by government officials as a priority area due to the existing regulatory backlog.

The reform forms part of the UK's wider objective to improve the efficiency of UK REACH and reduce divergence from EU chemicals regulation while retaining regulatory autonomy. The government has indicated an ambition to address most EU candidate list, authorization and restriction additions made since Brexit by April 2027, with closer alignment objectives set out in the 2025 Environmental Improvement Plan targeting the end of 2028. Further details are expected following consultation on the proposed framework.

New and revised mandatory hazard classifications for sixty chemical substances (consultation)

On 26 January 2026, the Health and Safety Executive published a proposal to amend the Great Britain (GB) Mandatory Classification and Labeling (MCL) list by introducing new and revised mandatory hazard classifications for sixty chemical substances. The update follows regulatory review under the GB classification, labeling, and packaging framework to reflect current scientific evidence and ensure consistent hazard communication, while supporting the functioning of the United Kingdom internal market and strengthening protection of human health and the environment.

Interested parties can take part in the consultation until 27 March 2026.

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NORTH AMERICA

Canada

Addition of eight chemicals and polymers and one living organism to the Domestic Substances List (in force)

On 13 January 2026, Canada's Minister of the Environment registered two orders amending the Domestic Substances List (DSL) to include nine substances (eight chemicals and polymers and one living organism) that meet the statutory criteria for listing. Under the Canadian Environmental Protection Act, 1999, substances not listed on the DSL are considered new to Canada and are subject to notification and assessment requirements prior to manufacture or import. The DSL serves as Canada's inventory of substances in commercial use and is amended regularly to reflect substances that have completed the new substances assessment process. Once listed, substances are no longer subject to the New Substances Notification Regulations.

The amendments are implemented through two orders:

- Order 2026-87-01-01 (SOR/2026-1) adds eight chemicals and polymers to the DSL. Two substances identified by Chemical Abstracts Service (CAS) Registry Numbers are added to Part 1 of the DSL, while six substances identified by masked names and Confidential Accession Numbers (CANs) are added to Part 3.
- Order 2026-112-01-01 (SOR/2026-2) adds one living organism to Part 5 of the DSL under the "Organisms" section. The listed organism is a cold-adapted, temperature-sensitive, and attenuated influenza A (H3N2 lineage)-like virus. No Significant New Activity provisions apply to the listed organism.

As a result of being added to the DSL, the substances are no longer subject to notification obligations under the New Substances Notification Regulations (Chemicals and Polymers) or the New Substances Notification Regulations (Organisms). The Orders entered into force on the date of registration, 13 January 2026. There are no penalties associated with this update.

Amendments to the Non-domestic Substances List (Order 2026-87-01-02) (effective)

The Canadian Environmental Protection Agency, under the Canadian Environmental Protection Act, published Order 2026-87-01-02 on 17 January 2026, which amends the Non-domestic Substances List (NDSL) under subsection 87(5) by deleting:

- phosphoric acid, octyl ester, potassium salt (CAS No. 51404-72-9)
- polyphosphoric acids, esters with triethanolamine, compds. with alkylpyridines (CAS No. 1568954-90-4)

The NDSL is a list of substances that are not used commercially in Canada above certain threshold quantities specified in the New Substances Notification Regulations, but that are known to be in international commerce. Substances listed under the NDSL are subject to notification requirements and other requirements under the New Substances Notification Regulations. Chemicals on the NDSL are subject to fewer information requirements in comparison to new chemicals not on the NDSL.

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The NDSL is divided into parts including:

- Part I: chemicals and polymers that are identified by their CAS numbers
- Part II: chemicals and polymers that are identified by masked names and Confidential Accession Numbers due to the substances being considered as confidential business information

The amendment entered into force on 17 January 2026. There are no penalties associated with the update.

Ministerial Conditions regarding amides, tall-oil fatty, N-[3-(dimethylamino) propyl] and siloxane derivative (in force)

On 17 January 2026, the Department of the Environment (DoE) published Ministerial Condition No. 22256 regarding the substance amides, tall-oil fatty, N-[3-(dimethylamino)propyl] (CAS No. 68650-79-3). The conditions permit the notifier to manufacture or import the substance but impose specific restrictions limiting its use to asphalt or bitumen applications. The notifier may import the substance only to incorporate it as a component of asphalt or bitumen emulsions. Furthermore, the notifier shall transfer physical possession or control of the substance only to persons who provide written confirmation that they agree to use the substance solely for these permitted applications. If the notifier intends to manufacture the substance in Canada, they must inform the Minister of the Environment in writing at least 120 days prior.

The Ministerial Condition No. 22256 officially came into force on 15 December 2025. Penalties for non-compliance have not been specified in the ministerial condition.

On 7 February 2026, the published Ministerial Condition No. 22407 that permits a specific notifier to manufacture or import a restricted siloxane derivative, provided they adhere to mandatory handling and reporting conditions. The DoE suspect that siloxanes and silicones, di-Me, Me 3-(2-oxiranylmethoxy)propyl, Me 3,3,3-trifluoropropyl (CAS No. 3086114-77-1) are toxic. The condition aims to prevent environmental damage by limiting releases and ensuring that the substance is tracked throughout the supply chain.

Effective from 27 January 2026 “the notifier” must comply with the following conditions:

- prevent and limit environmental releases
- report any spills immediately to emergency officers
- maintain detailed operational records for at least five years
- maintain records of all sales, uses and transfers
- prior to selling or transferring the substance to any other party, must inform the recipient of these conditions in writing and obtain the recipient's written agreement to comply

The Ministerial Condition came into force on 27 January 2026. There are no penalties specified with this update.

Restrictions on methylstyrenated phenol (draft)

Canada’s environment and health authorities have recommended adding methylstyrenated phenol (MSP; CAS No. 68512-30-1), an industrial paint ingredient, to Part 1 of Schedule 1 of CEPA. Part 1 is reserved for the highest-risk toxic substances and prioritizes partial or total prohibition. The proposal is set out through an updated draft assessment that builds on a 2021 review (comments due on 18 March 2026). The assessment evaluates MSP against CEPA toxicity criteria and considers its eligibility for inclusion in Part 1 of Schedule 1, alongside a revised risk management scope document.

The updated draft assessment reaffirms the 2021 preliminary conclusion that MSP meets CEPA section 64(a) toxicity criteria due to its potential immediate or long-term effects on the environment or its diversity. It also confirms that MSP meets the criteria under CEPA section 77(3) for inclusion in Part 1 of Schedule 1. If finalized, the listing would require the government to propose a risk management action within 24 months and finalize it 18 months later.

Authorities are considering applying the Prohibition of Certain Toxic Substances Regulations to MSP, which could target manufacturers, users, sellers, and importers of MSP and products containing it, including imported coatings, adhesives, industrial equipment, ships, and tires. Time-limited exemptions may be considered in exceptional circumstances, considering socio-economic factors and the absence of suitable alternatives.

No final regulatory decision has yet been taken. There are no penalties associated with this update.

Lithium-ion batteries regulations under the Canada Consumer Safety Act (consultation)

Health Canada has opened a pre-consultation on an initiative to regulate lithium-ion batteries under the Canada Consumer Product Safety Act (CCPSA). The CCPSA aims to protect the public by addressing or preventing dangers to human health or safety that are posed by consumer products. It allows for prohibiting the manufacture, import, advertisement, and sale of a consumer product that is a danger to human health or safety. Currently, there are no specific regulatory requirements for lithium-ion batteries in Canada.

The proposed initiative would establish mandatory safety requirements for lithium-ion batteries and consumer products containing them, including performance criteria that reduce the risks of overheating, fire, explosion, etc. With products that do not meet these mandatory safety criteria being banned. The proposal applies only to lithium-ion batteries and consumer products containing them within the scope of the CCPSA. It excludes:

- mains power-connected products that are subject to the Canadian Electrical Code (CSA C22.1)
- medical devices
- vehicles and a part of a vehicle that is integral to it, as it is assembled or altered before its sale to the first retail purchaser, including a part of a vehicle that replaces or alters such a part.
- pest control products, except treated articles

The pre-consultation was open until 14 February 2026. Feedback collected through this pre-consultation will be used to inform the development of mandatory requirements.

Amendment to the Domestic Substances List to add the letter “P” to the identifiers of 220 reduced regulatory requirement polymers (proposed order)

On 14 February 2026, Canada’s Minister of the Environment issued a notice of intent to amend the Domestic Substances List (DSL) by adding the regulatory flag letter “P” to the identifiers of 220 polymers, meaning they are subject to Significant New Activity provisions under the Canadian Environmental Protection Act, 1999 (CEPA). The affected polymers are listed directly in the proposed order, using numerical identifiers in Part 1 and masked chemical names in Part 3. The amendment is intended to clarify how these polymers are listed under CEPA.

The notice is mainly relevant to manufacturers and importers. If any of the 220 polymers are manufactured or imported in a form that does not meet the reduced regulatory requirement criteria and in quantities exceeding prescribed thresholds, notification under the New Substances Notification Regulations is required.

A 120-day public comment period applies from the publication date (14 February 2026), meaning comments are due by 14 June 2026. The changes will only become legally binding once the final order is published in the Canada Gazette, Part II.

Mexico

Administrative Agreement setting the maximum permitted consumption of hydrochlorofluorocarbons for the period 2026 to 2030 (in force)

Mexico has adopted a new Administrative Agreement that sets maximum national consumption limits for hydrochlorofluorocarbons (HCFCs) for the period 2026-2030. The measure supports Mexico's obligations under the Montreal Protocol and aims to achieve full elimination of HCFC use by 1 January 2030. It replaces the previous HCFC reduction framework that applied from 2021 to 2023 and provides legal certainty for the next phase of reductions.

The Agreement is organized into two main articles and transitional provisions.

- Article One introduces Table 1, which sets annual maximum HCFC consumption limits for each substance (in metric tonnes and ozone depletion potential tonnes) for 2026-2030
- Article Two sets the import control mechanism linked to the national consumption caps
- transitional provisions define the entry into force date and repeal the previous HCFC agreement from 2021

The Agreement introduces mandatory national quotas for HCFC consumption and confirms that some substances remain fully banned:

- progressive reduction of HCFC-22 and HCFC-123 consumption until full elimination in 2030
- continued zero-consumption requirement for HCFC-124, HCFC-141b and HCFC-142b
- import authorizations for HCFC-22 and HCFC-123 are only granted if national consumption limits are not exceeded

Companies involved in importing, manufacturing, or using HCFCs including businesses in refrigeration and air conditioning, foam production, aerosols, cleaning applications, and some medical uses must ensure compliance with the new national caps. Firms may also be supported through technical assistance and conversion programs funded under the Montreal Protocol framework.

The Agreement entered into force on 24 January 2026 and applies until the end of 2030. It formally replaces the previous HCFC reduction agreement and supports Mexico's commitment to reach zero HCFC consumption by 1 January 2030. There are no specific new penalties defined in this Agreement, but non-compliance may be sanctioned under existing environmental and import control laws.

More information can be found here in Spanish.

Decree to establish the General Law of Circular Economy (in force)

On 19 January 2026, Mexico published a Decree to establish the General Law on Circular Economy in Mexico. It aims to introduce the principles of Circular Economy to protect the environment, promote responsible consumption and prolonged use of products, and encourage circularity mechanisms. This is encouraged through national policies, economic instruments, and shared responsibility between agencies.

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The Decree establishes the Secretariat of Environment and Natural Resources as an authority that presides over the National Circular Economy System. This is a coordination body that integrates Secretariats of Economy, Finance, Energy, Education etc. This system is supported by the National Public Information Platform that aims for digital transparency, compliance reporting, and public registry of circular management plans.

The Ministry of Economy will issue a prior opinion on the general agreements for the implementation of the Extended Producer Responsibility (EPR). Producers, importers and coordinating bodies are required to comply with the general agreements and may also enter into voluntary environmental audit agreements. Tax incentives might be granted by the competent authorities. When a general agreement is published by the Secretariat in the Official Gazette, producers and importers must prepare the Circular Management and request registration in the Registry within the time limits provided in the registration. This plan must demonstrate how the company will recover, reuse, or recycle products at the end of their life cycle.

Once a plan is submitted via the National Platform, the authority issues a resolution within 60 business days. If no response is provided within this timeframe, the plan is legally deemed approved. Companies are mandated to incorporate circularity into product design and prioritize durability, repairability, and modularity wherever technically and economically feasible. They are also required to prioritize the use of secondary raw materials over virgin inputs to reduce the national environmental footprint.

Greenwashing through false environmental claims is prohibited under this law, as the labels must be verified by official Mexican Standards. A voluntary official seal is granted to products that exceed minimum circularity criteria, and they receive legal preference in public procurement processes.

The regulations of the General Law of Circular Economy will be issued within 180 calendar days after entry into force of this Decree. The National Circular Economy Program will be published not later than 180 calendar days from the publication of the regulations of this law. The identification of productive sectors and product categories for the 2026-2030 program must include those corresponding to plastics. From the entry into force of this law and within a period of five years, with extension by case-by-case agreement, the authorized sanitary landfills will begin a progressive process of reconversion to comply with the goals of reducing final disposal in order to promote their integration into the National Circular Economy Model.

Compliance is enforced through the General Law of Ecological Balance and Environmental Protection, and non-compliance can result in administrative fines. More information can be found here in Spanish.

Limiting lead content in paints and related new labeling obligations (consultation)

In January 2026, Mexico's Ministry of Health opened a consultation for a draft standard (PROY-NOM-003-SSA1-2025) that proposes to limit the total lead content in paints to 90 milligrams per kilogram (mg/kg), aligning national requirements with international best practices. Comments were due on 6 March 2026. The draft also introduces new labeling obligations, including the application of Globally Harmonized System (GHS) hazard classification to paint products marketed outside the workplace.

The draft standard establishes requirements covering product scope, labeling systems, conformity assessment, and enforcement responsibilities. It would replace the existing environmental health standard NOM-003-SSA1-2006 if adopted. The draft standard would apply to a wide range of paint products, including thinners, varnishes, colorants, enamels, primers, lacquers, pigments, sealers, inks, printing inks, and fillers, whether water-based or solvent-based. The 90 mg/kg lead limit applies to the non-volatile, dry-film portion of the product.

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Separate labeling systems would be required for consumer and industrial/professional products under GHS. Analytical laboratory testing would be required to demonstrate compliance. Verification and monitoring would be carried out by the Ministry of Health through COFEPRIS, in coordination with Mexican states.

If enacted, manufacturers and importers would have 550 calendar days from the date of enactment to exhaust existing non-compliant stock. There are no penalties associated with this update.

United States

Updates to the Occupational Safety and Health Administration Hazard Communication Standard (effective)

On 15 January 2026, the U.S. Occupational Safety and Health Administration (OSHA) issued a follow-up to the most recent update of the Hazard Communication Standard (29 CFR 1910.1200), extending compliance deadlines in specific sections of the Standard. The Hazard Communication Standard is a U.S. workplace safety regulation that ensures workers are informed about the hazardous chemicals they may be exposed to at work. The Standard was first published in 1983, and the latest major update was in May 2024.

The extended compliance deadlines apply to the following sections of the Standard:

- Section 1910.1200(j)(2)(i) – deadline for manufacturers, importers, and distributors to comply with updated hazard communication requirements for substances (e.g., updated classification, labels, Safety Data Sheets [SDSs]) is extended from 19 January 2026 to 19 May 2026
- Section 1910.1200(j)(2)(ii) – deadline for employers to update workplace labeling, hazard communication programs, and training for substances is extended from 20 July 2026 to 20 November 2026
- Section 1910.1200(j)(3)(i) – deadline for manufacturers, importers, and distributors to comply with updated hazard communication requirements for mixtures is extended from 19 July 2027 to 19 November 2027
- Section 1910.1200(j)(3)(ii) – deadline for employers to update workplace labeling, hazard communication programs, and training for mixtures is extended from 19 January 2028 to 19 May 2028.

Earlier, on 8 January 2026, OSHA issued a final rule correcting inadvertent errors and making one technical amendment to the Standard. The 2024 revision aligned the Standard with elements of the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals (Rev. 7) but contained minor textual and formatting errors. OSHA previously issued a corrections notice on 9 October 2024 to address selected errors, and this January 2026 rule addresses additional minor and typographical errors identified during continued review.

The corrections are set out in amendatory text that identifies specific changes to regulatory paragraphs and appendices of the Standard. The corrections affect:

- 29 CFR 1910.1200(c) – Definitions
- 29 CFR 1910.1200(d) – Hazard Classification
- Appendices A, B, C, D, and F of 29 CFR 1910.1200

This amendatory text does not impose new substantive regulatory duties on regulated entities. Instead, it:

- adds and corrects headings to clarify structure
- updates definitions to include “chemicals under pressure” under the physical hazard definition
- corrects inadvertent omissions and formatting errors in hazard classification and work area definitions
- corrects figures and tables in Appendix A to align with the originally intended design

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- deletes language that was inadvertently included from GHS content not applicable in OSHA's standard
- corrects footnotes, spelling, numbering, and cross-references in Appendix B tables
- makes stylistic and formatting edits in Appendix C
- corrects Section 2 cross-reference and typographical issues in Appendix D to clarify hazard classification requirements
- revises Appendix F language to use "sex-specific tumors" instead of "gender-specific tumors"

The final rule corrects errors arising from the 2024 revision without changing the substantive regulatory obligations of employers or chemical manufacturers. The corrections improve textual accuracy and clarity in definitions, classification criteria, appendices, figures, and tables. This enhances consistency with GHS provisions while avoiding confusion in classification, labeling, and SDS preparation. The corrections became effective on the date of publication, 8 January 2026.

There are no penalties specifically associated with this correction notice beyond the enforcement of the Standard.

Amendments to the Toxic Substances Control Act (draft)

On 15 January 2026, the United States House Energy and Commerce Subcommittee on Environment published a discussion draft concerning amendments to the Toxic Substances Control Act (TSCA), imposing changes to key sections in TSCA, including definitions, review of new chemicals, review and management of existing chemicals, relationship to other federal laws, citizens' petitions and more.

The following are key changes that the draft proposes:

- narrowing the definition of "conditions of use," limiting the Environment Protection Agency (EPA) to assessing risks only in situations that are more likely than not to occur, rather than all circumstances that are reasonably foreseeable.
- For new chemicals, limiting the EPA's risk review to the specific conditions of use identified by the submitter, and shifting the standard by which EPA identifies the need for regulatory action from a chemical that may present an unreasonable risk to "more likely than not that such unreasonable risk will occur"
- Introducing exemptions for new chemicals already approved by another Organization for Economic Co-operation and Development (OECD) member country
- for existing chemicals, directing the EPA to consider only those that are "more likely than not" to result in unreasonable risk when conducting risk evaluations
- prohibiting the EPA from issuing risk management measures that conflict with other federal requirements and requiring the EPA to adopt cost-effective risk management approaches, and approaches that do not create greater risks to human health or the environment
- introducing several procedural changes, including allowing manufacturers to request priority reviews for certain substances and establishing deadlines for the EPA to meet with companies regarding submissions
- removing the ability for citizens to petition for EPA to initiate regulatory action but allowing citizens to petition for EPA to reconsider a chemical as a high-priority substance for risk evaluation.

The US House Energy and Commerce Subcommittee on Environment held a legislative hearing to discuss this draft amendment on 22 January 2026.

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Minnesota makes available the per- and polyfluoroalkyl substances Reporting and Information System for Manufacturers, a.k.a. PRISM (adopted)

Under Minnesota's PFAS pollution prevention law (Amara's Law), the Minnesota Pollution Control Agency (MPCA) requires manufacturers to report intentionally added per- and polyfluoroalkyl substances (PFAS) in products sold, offered for sale, or distributed in Minnesota, and to pay a fee. Reporting is completed through the PFAS Product Reporting and Information System for Manufacturers (PRISM), which manufacturers and their representatives use to register, pay, and submit reports.

MPCA states that reports include information such as a product description, the purpose or function PFAS serves in the product, and the amount of each PFAS. MPCA notes that adopted rules provide flexibility, including grouping similar products and reporting concentration ranges rather than exact amounts. The rules set a one-time flat fee of $800 per manufacturer, and MPCA states that information, except trade secrets, will be publicly accessible after review. The MPCA clarifies that "manufacturer" includes importers if the brand owner lacks a U.S. presence.

PRISM was made available in January 2026, with system updates made in February 2026. Initial reports are due by 1 July 2026, and subsequent reports and updates, when required, are due each year on 1 February.

More information from the Minnesota Pollution Control Agency can be found here.

New Mexico files a revised proposed rule to implement the state's per- and polyfluoroalkyl substances Protection Act (draft)

On 16 January 2026, the New Mexico Environment Department (NMED) filed a revised proposed rule to implement the state's PFAS Protection Act (HB 212), enacted in 2025. The proposed rule would establish reporting, labeling, and prohibition requirements for per- and polyfluoroalkyl substances (PFAS) in consumer products and is intended to guide NMED's administration of the PFAS restrictions set out in the Act.

The PFAS Protection Act introduces phased restrictions on intentionally added PFAS in consumer products, beginning with restrictions on certain product categories in 2027, expanding in 2028, and culminating in a broad ban on PFAS in most consumer products by 2032. The revised proposed rule builds on an earlier proposal issued in October 2025 and introduces clarifications particularly with respect to labeling requirements and exemptions.

The revised proposal introduces exemptions from the reporting and prohibition requirements for pesticides regulated under the U.S. Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). It also proposes exemptions from labeling requirements for products where labeling is preempted under FIFRA or already regulated under 40 C.F.R. Section 156.10.

Additional labeling exemptions are proposed for veterinary products, including veterinary parasiticides and veterinary biologics, as well as the packaging of veterinary products regulated by the U.S. Food and Drug Administration (FDA), the U.S. Department of Agriculture, or the U.S. Environmental Protection Agency. Medical devices, drugs, and the packaging of medical devices and drugs regulated by FDA would also be exempt from labeling requirements.

The revised proposed rule clarifies acceptable PFAS label statements, which would include:

- "This product is made with PFAS"
- "Made with PFAS"
- "Contains PFAS"
- "Contains component parts made with PFAS" (for complex durable goods)

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The proposal further clarifies the process of requesting labeling waivers. NMED may grant labeling waivers on a product-by-product basis or on a class-wide basis for products that share essential physical characteristics and functions. Manufacturers seeking a labeling waiver would be required to pay an application fee of $2,000 for an individual product or $5,000 for a product class. Approved label waivers would expire three years after approval.

Complete label waiver requests submitted by 31 October 2026 would be considered approved pending NMED review. NMED would issue a final determination to approve or deny waiver requests by 1 June 2027. If a waiver request is denied, manufacturers would be required to label affected products within 90 days of the denial, although products manufactured prior to the denial could continue to be sold without labeling.

The proposed rule is not yet in force. The New Mexico Environmental Improvement Board has started a public rulemaking hearing on 23 February 2026 that would continue as long as necessary to hear all testimony, evidence, and the public comment through March 6, 2026. Penalties, if any, would be established under the final adopted rule and the PFAS Protection Act.

California modifies the proposed regulations implementing Senate Bill 54, the Plastic Pollution Prevention and Packaging Producer Responsibility Act (draft amendment)

California's Department of Resources Recycling and Recovery (CalRecycle) has issued modifications to the proposed permanent regulations implementing Senate Bill 54 (SB 54), the Plastic Pollution Prevention and Packaging Producer Responsibility Act. SB 54 establishes an extended producer responsibility (EPR) framework requiring producers to take responsibility for the lifecycle and end-of-life management of packaging and certain single-use plastic products in California.

The modifications include the following elements:

- updates to multiple provisions of the draft regulations following stakeholder feedback received during the initial consultation period.
- Clarification that CalRecycle's oversight and enforcement responsibilities
- Refining the regulatory framework supporting implementation of the Act
- Implementation of Assembly Bill 1201 requirements for products marketed as "compostable" – these provisions require that products labeled as compostable must be certified by approved third-party organizations in accordance with specified technical standards.

The revisions focus on clarifying procedures, responsibilities, and compliance mechanisms associated with the producer responsibility system and compostable product certification.

The regulation is still under development. Following the 15-day comment period, CalRecycle will consider stakeholder feedback before adopting the final regulations. Penalties for non-compliance will be established under California legislation implementing SB 54 and related laws.

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OCEANIA

Australia

Variation and additions to the Australian Inventory of Industrial Chemicals (effective)

On 20 January 2026, the Australian Industrial Chemicals Introduction Scheme (AICIS) published two notifications:

- Notification 1: Variation to the Australian Inventory of Industrial Chemicals (AIIC) – bisphenol A dimethacrylate (CAS No. 3253-39-2)
- Notification 2: Variation to AIIC listing after evaluation – (Azo Dyes Group)

These announce changes to the listing of chemicals in the Australian Inventory of Industrial Chemicals (AIIC) following concluded risk evaluations, which are available on the announcement page.

Following the completion of risk evaluations under Part 4 of the Industrial Chemicals (IC) Act of 2019, the AICIS has modified the AIIC listing for every chemical listed in Notifications 1 and 2 to include or amend Specific Information Requirements (SIRs). For these chemicals, introducers (importers or manufacturers) are now legally obliged to notify the AICIS within 20 working days if specific circumstances regarding the chemical's use change, particularly involving a shift towards consumer or non-professional use:

- For Notification 1, introducers must notify if bisphenol A dimethacrylate is being introduced for consumer end use (excluding the end use of articles)
- For Notification 2, introducers must notify if the Azo Dyes Group begins to be used by anyone other than professional workers, or if the end use changes from textile (fabric) dyes and printing inks – the specific substances listed in Notification 2 are:
  - benzenamine, N,N-diethyl-3-methyl-4-[2-(5-nitro-2-thiazolyl)diazenyl]- (CAS No. 70693-64-0)
  - C.I. Disperse Blue 82 (CAS No. 12222-80-9)
  - ethanol, 2-[ethyl[3-methyl-4-[2-(5-nitro-2-thiazolyl)diazenyl]phenyl]amino]-, 1-acetate (CAS No. 15141-18-1)
  - ethanol, 2-[ethyl[3-methyl-4-[2-(5-nitro-2-thiazolyl)diazenyl]phenyl]amino]- (CAS No. 68516-81-4)
  - 1,2-propanediol, 3-[ethyl[3-methyl-4-[2-(5-nitro-2-thiazolyl)diazenyl]phenyl]amino]- (CAS No. 69766-79-6)
  - ethanol, 2,2'-[[3-methyl-4-[2-(5-nitro-2-thiazolyl)diazenyl]phenyl]imino]bis- (CAS No. 72987-42-9)

In addition, the AICIS published:

- Notification 3 (19 January 2026): Variation of AIIC listing following revocation of Confidential Business Information (CBI) approval regarding decanedioic acid, reaction products with 1-octadecanamine, barium salts (CAS No: 403656-23-5)
- Notification 4 (9 January 2026): Variation of AIIC listing following revocation of CBI approval and variation of AIIC terms of listing for two substance:
  - 1,3-benzenedicarboxylic acid, polymer with 5-amino-1,3,3-trimethylcyclohexanemethanamine, 1,4-benzenedicarboxylic acid, 1,4-cyclohexanedimethanol and 1,2-ethanediol, phthalic anhydride-terminated (CAS No. 1236307-83-7)
  - formaldehyde, polymers with phenol (tetrapropenyl) derivs (CAS No: 3103256-19-2)

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For Notification 4, the variations in the AIIC listings occurred because the CBI status for the two substances changed under Section 94 of the IC Act. The approval for the specific chemical name to be treated as confidential was revoked and the listing was updated to reflect it, rather than the generic name. In addition, Notification 4 announced a further variation under Section 85 of the IC Act to expand the SIRs.

On 19 January 2026, the AICIS listed 4 chemicals on the Australian Inventory of Industrial Chemicals. Under Section 82 of the IC Act, any chemical that has been issued an Assessment Certificate must be added to the AIIC five years after the certificate was issued. During the five years before it is listed on the AIIC, only the holder(s) of the assessment certificate are legally allowed to import or manufacture that chemical (unless others apply for their own certificates). It then transitions from "Assessed introductions" to "Listed introductions" so that any other company can import or manufacture that chemical without needing their own assessment certificate, provided they comply with any specific conditions of use and/or obligations listed in the new Inventory entry.

The four substances are:

- propanoic acid, 3-hydroxy-2-(hydroxymethyl)-2-methyl-, homopolymer, ester with .alpha.-hydro-.omega.-hydroxypoly(oxy-1,2-ethanediyl) ether with 2-ethyl-2-(hydroxymethyl)-1,3-propanediol (?:3:1), 2-propenoate (CAS No. 2170526-45-9)
- neodecanoic acid, 2-oxiranylmethyl ester, polymer with hexahydro-1,3-isobenzofurandione, 2-ethylhexyl ester (CAS No. 1016606-37-3)
- carbon nanotubes (CAS No. 308068-56-6)
- fats and glyceridic oils, crambe abyssinica, esters with sunflower hydroxysteroids (CAS No. 2432898-89-8)

The four substances all have the same specific information requirements in the AIIC:

- obligations to provide information apply – manufacturers and importers must let the authority know within 28 days if the circumstances of the importation or manufacture (introduction) are different from those in the assessment
- manufacturers and importers should review their circumstances within the 28-day period to report deviations starting from the listing date; they are also now obligated to comply with registration, reporting, and record keeping requirements associated with listed introductions

Under the IC Act, there are financial penalties and regulatory sanctions that may be applied for failure to comply with specific conditions of use and/or obligations listed in the Inventory entry.

The Australian Parliament passes the National Environmental Protection Agency Act 2025 establishing the National Environmental Protection Agency (announced)

The Australian Parliament has passed the National Environmental Protection Agency Act 2025 to establish a new independent federal body, the National Environmental Protection Agency (NEPA). The Act is designed to support the delivery of "accountable, efficient, outcomes-focused and transparent" environmental regulatory decision-making by transferring regulatory powers from the Department or Minister to an independent Chief Executive Officer (CEO). The Act is scheduled to enter into force on 1 July 2026, marking the formal start of NEPA's operations.

The Act is structured into six parts outlining the governance, powers, and information management of the new agency:

- Part 1 defines key terms and the object of the Act
- Part 2 establishes NEPA as a listed entity and creates the independent office of the CEO
- Part 3 outlines responsibilities, including the requirement for the CEO to maintain public registers of decisions to ensure transparency

- Part 4 establishes a regime for the collection, use, and confidentiality of information, including strict rules on disclosure
- Part 5 covers the appointment of the CEO, staff, and the establishment of an optional advisory group to assist with technical decisions
- Part 6 contains miscellaneous provisions, including delegation powers, annual reporting requirements, and independent reviews of NEPA's administration every five years

Penalties for non-compliance include civil penalties of 200 penalty units for the unauthorized use or disclosure of protected information by entrusted persons or officials. A "penalty unit" is a standard monetary measure under Commonwealth law, with the current value set at $330, meaning that 200 penalty units equals a $66,000 civil fine. Note that penalties for environmental offenses (e.g., pollution, illegal dumping) remain within the specific underlying acts that NEPA will now enforce.

New Zealand

Online hazardous substances reporting and notifications portal (effective)

On 1 January 2026, New Zealand's Environmental Protection Authority (NZEPA) launched an online hazardous substances reporting and notifications portal to aid in compliance with hazardous substances reporting obligations. The portal allows companies to submit and manage information about the reporting of hazardous substances within 30 days of their initial import or manufacture. Repackaged or re-labeled products are not required to be reported, and bulk imports of active chemicals are only required to be reported once the substances are incorporated into products.

Companies are required to submit information about any changes within 30 days and keep the information up to date. The portal also allows companies to submit annual reports of certain substances or explosives. Annual reports are due by 31 May 2026 for the previous calendar year.

NZEPA hosted a webinar on 25 February 2026 to provide further guidance on the use of this portal. No penalties are associated with this update.

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