

Newsletter

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

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,
Policies, and Standards
Issue 7 – 2026*



WHO IS IAEG?

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

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

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

IAEG WORK GROUP 9 NEWSLETTER

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

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

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

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GLOBAL

Release of ISO/DIS 14060 establishing requirements for net-zero aligned organizations (draft)

The International Organization for Standardization (ISO) has released [ISO/DIS 14060](#), a draft international standard establishing requirements for net-zero aligned organizations.” Published for public consultation on June 17, 2026, the standard is intended to provide a globally consistent framework for defining, implementing, and demonstrating credible net zero strategies across organizations of all sizes and sectors, including requirements for emissions reduction targets, transition planning, and verification of progress in line with the Paris Agreement.

The standard emphasizes measurable emissions reductions within an organization’s value chain, supported by structured transition plans and transparent reporting, and is designed to create a consistent global definition of organizational net zero. ISO 14060 remains under development and subject to consultation, with final publication expected following the review process. No fines or penalties for non-compliance have been established, as ISO standards are voluntary and intended to guide best practice rather than impose regulatory enforcement.



ASIA

India

Amendment to Ecomark Rules, 2024 regarding certifications (draft)

India’s Ministry of Environment, Forest, and Climate Change published a [draft amendment to the Ecomark Rules, 2024](#) on 8 June 2026 (can also be found [here](#) in Hindi). The proposal would revise the criteria for granting Ecomark certification to paints, varnish and powder coatings, batteries, paper products, wood and wood-substitute products, fire extinguishers, and coir products. Comments and objections may be submitted within 60 days of publication in the Official Gazette.

The proposed criteria introduce additional chemical, recycled content, waste-management, energy-efficiency, and product-transparency requirements. Paints and coatings would be subject to limits on volatile organic compounds and heavy metals, as well as restrictions on per- and polyfluoroalkyl substances (PFAS), polychlorinated biphenyls (PCBs), short-chain chlorinated paraffins (SCCPs), polybrominated biphenyls (PBBs), polybrominated diphenyl ethers (PBDEs), bisphenol A (BPA; CAS No. 80-05-7), specified phthalates, organotin compounds, glycol ethers, alkylphenol ethoxylates (APEOs), formaldehyde (CAS No. 50-00-0), halogenated solvents, and ozone-depleting substances. Packaging would have to exclude halogenated plastics, and manufacturers would be required to source at least 25% of their energy from renewable sources.

Fire extinguishers seeking certification would be prohibited from containing ozone-depleting substances, while their extinguishing agents could not be formulated with specified heavy metals or fluorinated organic compounds, including

PFAS. More than 90% of the metal components used in extinguisher containers would have to be recycled, while container coatings would need to use Ecomark-certified paint. Battery criteria would introduce requirements concerning Extended Producer Responsibility (EPR) registration, recycled lead content, hazardous-substance limits, pollution controls, waste recycling, and reduced energy consumption.

The revised paper and wood-product criteria would promote recycled or sustainably sourced materials, restrict specified hazardous chemicals, and require enhanced waste, emission, water, and energy management. Relevant manufacturers would also be subject to QR-code disclosure of the Ecomark certification criteria, applicable EPR-related packaging, waste-management obligations, and ISO 14001:2015 environmental management certification. The coir criteria would address natural raw materials, chemical limits, renewable energy, wastewater management, air emissions, and end-of-life information.

Japan

Amendments to labeling requirements and technical standards for fire extinguishers and extinguishing agents containing perfluoro(hexane-1-sulfonic acid)-related substances (in force)

Japan amended the notification specifying environmental-contamination-prevention labeling requirements and the ministerial order establishing [technical standards](#) (can also be found [here](#) in Japanese) for fire extinguishers, fire-extinguisher agents, and foam fire-extinguishing agents covered by the supplementary provisions of the Chemical Substances Control Law Enforcement Order. The amendments were promulgated on 12 June 2026 and entered into force on 17 June 2026, following the designation of perfluoro(hexane-1-sulfonic acid)-related substances, referred to as PFHxS-related substances, as Class I Specified Chemical Substances.

The [labeling amendment](#) (can also be found [here](#) in Japanese) adds PFHxS-related substances to the substances for which prescribed environmental-contamination-prevention information must be displayed on product containers, packaging, or shipping documents. The technical standards amendment adds PFHxS-related substances to the definition of contaminated matter, including waste liquids containing the regulated substances and cloths or other unwanted materials to which they have adhered.

Fire and Disaster Management Agency [guidance](#) (can also be found [here](#) in Japanese) indicates that PFHxS-related substances may be present in certain foam fire-extinguishing agents, mechanical foam fire extinguishers and extinguishing agents used in neutral-type strengthened-liquid extinguishers. Where industry association information does not clarify whether an agent contains a Class I Specified Chemical Substance, holders should confirm its composition with the manufacturer and, where such substances are present, handle the product in accordance with the amended technical standards. The guidance also notes that applicable water-pollution controls may apply and that expired agents and contaminated materials arising from transfer, leakage, training, or inspection must be disposed of in accordance with relevant waste legislation.

Malaysia

Regulations to establish mandatory controls for the import, export, manufacture, and unintentional generation or release of scheduled environmentally hazardous substances (consultation)

Malaysia's Department of Environment opened a public consultation on the [draft Environmental Quality \(Environmentally Hazardous Substances\) Regulations 202X](#) on 22 June 2026 (can also be found [here](#) in Malay). The draft is being developed under Section 51(1)(u) of the Environmental Quality Act 1974 and would establish mandatory controls for the import, export, manufacture, and unintentional generation or release of scheduled environmentally hazardous substances. It would also support Malaysia's implementation of the Stockholm and Minamata Conventions. The consultation closed on 22 July 2026.

The proposed framework divides regulated substances into three schedules. Schedule I substances would be prohibited from being imported, exported, or manufactured in Malaysia. Schedule II substances would be controlled through notification and permission requirements. Schedule III would cover substances generated or released unintentionally. Priority substances would include chemicals covered by the Rotterdam, Stockholm, and Minamata Conventions, the European Union Prior Informed Consent Regulation, and other substances identified by the Director General.

Importers and exporters of Schedule II substances would be required to notify the Director General and obtain written permission before moving the substances into or out of Malaysia. Manufacturers would have to submit notification at least thirty days before manufacturing begins. The Director General could suspend or revoke permission when the information submitted is inaccurate.

Operators unintentionally generating or releasing Schedule III substances would be required to notify the Director General and submit an action plan for reducing or eliminating the substances before 31 December each year. Company registration, scheduled environmentally hazardous substances (EHS) inventories, export notifications, import responses, explicit consent procedures and written permissions would be managed through the MyEHS system.

Regulated entities would separately be required to retain notifications and related information for three years, make the records available for inspection and ensure that workers involved in managing scheduled EHS receive appropriate training. The draft excludes radioactive substances, pesticides, poisons and substances regulated under Malaysia's Chemical Weapons Convention Act 2005. Where a scheduled EHS is also regulated under another Malaysian regime, it may remain subject to both sets of requirements.

Specified breaches, including prohibited activities, notification and permission requirements, obligations concerning unintentionally generated EHS, and the provision of false or misleading information, could result in a fine of up to RM100,000, imprisonment for up to five years, or both. A continuing offence could attract an additional fine of up to RM1,000 for each day it continues. Certain other offences may be compounded under Section 45 of the Environmental Quality Act 1974.

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

Vietnam

Amendments to technical regulations concerning the quality of industrial sodium hydroxide, poly aluminum chloride, and industrial ammonia” (effective)

The Ministry of Industry and Trade of Vietnam has adopted [Circular No. 38/2026/TT-BCT](#) (can be found [here](#) in Vietnamese) enacting amendments to three national technical regulations concerning the quality of industrial sodium hydroxide (QCVN 03A:2020/BCT), poly aluminum chloride (PAC) (QCVN 06A:2020/BCT), and industrial ammonia (QCVN 07A:2020/BCT). The update aligns these regulations with recent national laws on chemical labeling, dangerous goods transport, and conformity assessment.

The circular includes three appendices outlining national technical regulation amendments:

- » Appendix I: Updates standards for industrial sodium hydroxide (CAS No. 1310-73-2) and abolishes the previous product list
- » Appendix II: Updates standards for PAC (CAS No. 1327-41-9)
- » Appendix III: Updates standards for industrial ammonia (CAS Nos. 7664-41-7 and 1336-21-6) – it includes Table 1, detailing technical limits (iron content and evaporation residue) and test methods for ammonia concentrations from 10% to less than 35%

Manufacturers, importers, and distributors of industrial sodium hydroxide, PAC, and industrial ammonia must follow updated compliance obligations under the amended technical regulations and must note that are now legally classified as "medium-risk and high-risk products" falling under the regulatory scope of Circular No. 33/2026/TT-BCT. Pure sodium hydroxide, food-grade sodium hydroxide, pure ammonia, and food-grade ammonia are exempt from these requirements. Additionally, the regulation specifies that it only covers industrial liquid ammonia with a concentration level ranging from 10% to 35%

Key requirements include:

- » Conformity Assessment: Companies must evaluate product conformity according to Article 13 of Circular No. 14/2026/TT-BKHCN; importers must use Method 1 for their assessments, while domestic producers must use Method 5
- » Conformity Marks: The application of conformity marks on products must align with Clause 2, Article 4 of Circular No. 14/2026/TT-BKHCN
- » Declaration Registration: After completing conformity assessments, entities must register their declarations on the National Database on Standards, Metrology, and Quality – if the database is technically unavailable or lacks infrastructure, companies must submit their registrations directly or via postal services
- » Labeling: Chemical labels must comply with Decree No. 37/2026/ND-CP, which details provisions for product and goods quality and other current labeling regulations
- » Transportation: Companies must transport these chemicals according to the hazardous goods regulations outlined in Decree No. 34/2024/ND-CP and its amendment, Decree No. 161/2024/ND-CP; this includes adhering to procedures for acquiring transport permits and ensuring that drivers or loaders possess valid training certificates for handling dangerous goods on roads
- » Reporting Difficulties: Any organization or individual (including employers, manufacturers, importers, and distributors) that faces difficulties or problems during the implementation of these regulations is obliged to promptly report them in writing to the Ministry of Industry and Trade (via the Chemicals Agency) for guidance or amendment

The circular was published on 30 June 2026 and entered into force on 1 July 2026. Penalties for non-compliance include inspections, surveillance, and regulatory enforcement measures handled by the Department of Domestic Market

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Management and Development in coordination with relevant agencies, in accordance with the Technical Regulation and current laws.

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



EUROPE

European Union

Harmonized classification and labeling consultations for methyltin mercaptide (published)

On 29 June 2026, the European Chemicals Agency (ECHA) opened a [consultation](#) on a proposal submitted by Italy to revise the harmonized classification and labeling of 2-ethylhexyl 10-ethyl-4,4-dimethyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate, also known as methyltin mercaptide (CAS No. 57583-35-4). The substance is used as a heat stabilizer in PVC processing. Comments may be submitted on reproductive toxicity and specific target organ toxicity following repeated exposure until 28 August 2026.

The dossier submitter proposes the following future classifications:

- » Acute Tox. 4, H302
- » Skin Sens. 1A, H317
- » STOT RE 2, H373, affecting the nervous and immune systems

The proposal would therefore remove the Repr. 2 classification and revise the specific target organ toxicity classification from STOT RE 1, H372, to STOT RE 2, H373. The acute toxicity and skin sensitization classifications would remain unchanged. The proposal remains subject to consultation and may change before ECHA's Committee for Risk Assessment adopts its opinion.

If the revised harmonized classification is subsequently adopted, suppliers and users of the substance and mixtures containing it may need to review product classifications, labels, safety data sheets, and related compliance documentation.

Corporate Sustainability Due Diligence Directive - development of guidelines (consultation)

On 12 June 2026, the European Commission opened a [consultation](#) on the development of guidelines supporting the implementation of Directive (EU) 2024/1760, commonly known as the Corporate Sustainability Due Diligence Directive (CSDDD). Comments were due on 24 July 2026. The Directive requires large European Union (EU) companies and certain non-EU companies with significant business activities in the EU to identify, prevent, mitigate, and end adverse impact on human rights and the environment throughout their own operations, the operations of their subsidiaries, and their value chains. The consultation seeks stakeholder input to help shape practical implementation guidance.

The initiative concerns the preparation of non-binding Commission guidelines that will accompany the implementation of the CSDDD. The guidelines are intended to provide practical direction for companies subject to the Directive, Member State

authorities responsible for enforcement, and stakeholders seeking to understand or exercise their rights under the legislation. The consultation targets a broad range of stakeholders, including companies, business associations, NGOs, trade unions, public authorities, financial institutions, academics and members of the public.

The future guidelines will support the implementation of due diligence obligations established under Directive (EU) 2024/1760. These obligations require in-scope companies to identify, assess, prevent, mitigate, and remedy actual or potential adverse human rights and environmental impacts arising from their own operations, subsidiaries and business relationships throughout their value chains. Through this consultation, the Commission is gathering evidence on practical implementation challenges, stakeholder expectations, enforcement needs and areas where additional clarification may be required. The resulting guidance is expected to assist both regulated companies and enforcement authorities in applying the Directive consistently across the EU.

The consultation will inform the development of Commission guidelines, which are currently planned for adoption during the first quarter of 2027. The consultation does not introduce any new legal obligations and does not amend Directive (EU) 2024/1760. There are no penalties associated with this update.

Restrictions for certain chromium VI oxides, oxyacids, and salts (consultation)

The European Chemicals Agency (ECHA) opened a [consultation](#) on the draft opinion of the Committee for Socio-economic Analysis (SEAC) for the proposed REACH restriction on certain chromium VI oxides, oxyacids, and salts including chromium VI salts with different stoichiometry and hydration degrees. It seeks to address risks to human health and proposes a restriction on uses at concentrations equal to or greater than 0.01% w/w unless specified occupational exposure and site-specific emission limits are met.

The proposal covers use categories including formulation of mixtures, electroplating on plastic or metal substrates, primers and slurry coatings, other surface treatments, and use as functional additives or process aids. An 18-month transition period is proposed across all restriction options and use categories.

The consultation opened on 17 June 2026 with comments due on 17 August 2026. After SEAC finalizes its opinion, ECHA will send the joint Risk Assessment Committee and SEAC opinions to the European Commission, which will decide whether to propose an amendment to Annex XVII of REACH.

Denmark

Restriction of the use of certain hazardous substances in electrical and electronic equipment (in force)

Denmark adopted Order [BEK No. 541](#) of 17 June 2026 (can also be found [here](#) in Danish) on the restriction of the use of certain hazardous substances in electrical and electronic equipment (EEE). The Order repeals Executive Order No. 1369 of 2 December 2024 and implements Directive 2011/65/EU (RoHS), as most recently amended by the European Commission Delegated Directives (EU) 2025/1802, 2025/2363 and 2025/2364.

The Order contains five annexes:

- » Annex 1 lists the categories of EEE covered by the Order
- » Annex 2 specifies maximum concentration values in homogeneous materials for ten restricted substances: lead (CAS No. 7439-92-1), mercury (CAS No. 7439-97-6), cadmium (CAS No. 7440-43-9), hexavalent chromium (CAS No. 18540-29-9), polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), di(2-ethylhexyl)phthalate

(DEHP; CAS No. 117-81-7), benzyl butyl phthalate (BBP; CAS No. 85-68-7), dibutyl phthalate (DBP; CAS No. 84-74-2), and diisobutyl phthalate (DIBP; CAS No. 84-69-5)

- » Annex 3 contains exemptions from the restriction for specified applications
- » Annex 4 contains exemptions specifically applicable to medical devices and monitoring and control instruments
- » Annex 5 sets out the model and required elements for the European Union Declaration of Conformity.

The revised annexes update several RoHS exemptions, including lead-related exemptions for alloys, solders, and EEE components, with category-specific expiry dates.

The Order prohibits placing EEE, including cables and spare parts, on the market if it contains any restricted substance above the prescribed concentration limits, unless an exemption applies. The restrictions for DEHP, BBP, DBP, and DIBP apply from 22 July 2019 for EEE generally, and from 22 July 2021 for medical devices, in vitro diagnostic medical devices, monitoring and control instruments, including industrial monitoring and control instruments. The Order also preserves specific allowances for reused spare parts in controlled closed-loop business-to-business return systems, subject to notification of reuse, and for cables or spare parts used to repair, reuse, update functions or upgrade the capacity of specified legacy EEE placed on the market before defined cut-off dates.

Excluded equipment includes military and national security equipment, space equipment, large-scale stationary industrial tools, large-scale fixed installations, transport equipment except non-type-approved electric two-wheelers, mobile non-road machinery made available only for professional use, active implantable medical devices, specified solar panels, certain business-to-business research and development equipment, equipment specifically designed to be installed as part of excluded or out-of-scope equipment, pipe organs and personal non-commercial imports.

Manufacturers must ensure RoHS compliance before placing EEE on the market, conduct conformity assessments, prepare technical documentation, issue an EU Declaration of Conformity and affix the CE marking. Importers and distributors must verify applicable compliance information before placing or making EEE available on the market. Manufacturers, importers, and authorized representatives have documentation-retention obligations as applicable, and economic operators must be able to identify the operators from whom they received EEE and to whom they supplied EEE for ten years.

The Danish Environmental Protection Agency is responsible for supervision and enforcement. The Order entered into force on 1 July 2026. Transitional provisions continue to apply for certain legacy EEE, including equipment first placed on the EU market before 2 January 2013, which remains subject to the earlier BEK No. 284 of 24 March 2011.

Penalties for non-compliance include fines and, where violations are committed intentionally or through gross negligence and result in harm or risk of harm to human health, environmental damage or financial gain, imprisonment for up to two years.

[France](#)

[Amendment to the Environmental Code regarding fluorinated greenhouse gases \(consultation\)](#)

The Ministry of Ecological Transition issued a draft decree to amend the French Environmental Code to align with the European Regulation (EU) 2024/573 on fluorinated greenhouse gases (F-gases). It updates the rules for F-gases used as refrigerants, electrical insulators, fire extinguishing agents, and solvents. The text also updates references to European chemical regulations. It clarifies penalties for non-compliance regarding chemical exports and imports under Regulation (EU) No 649/2012, and chemical refilling stations under the CLP Regulation (EC) No 1272/2008.

The draft decree introduces the following obligations:

- » operators must conduct regular leak checks on fixed and mobile equipment containing ≥ 5 tonnes CO₂ equivalent for Annex I gases, or ≥ 1 kilogram for Annex II Section 1 gases:
 - starting 12 March 2027, leak check and document retention rules apply to operators of all mobile equipment
 - operators must retain leak test records and intervention sheets for five years
 - operators must relabel equipment if they modify or substitute the refrigerant circuit
- » manufacturers and importers must properly label hermetically sealed, pre-charged equipment before placing it on the market
- » distributors must keep a transfer register for five years:
 - they must verify buyers hold the correct certifications before supplying F-gases
 - they must take back unused or unopened refrigerants in their original packaging, and packaging waste, free of charge
- » certified personnel and technicians handling F-gases must complete new refresher training courses – the decree updates certification requirements for working on fixed, mobile, and electrical switching equipment.

The public consultation closed on 8 July 2026. The decree will enter into force the day after its publication, with specific leak testing provisions for mobile equipment applying from 12 March 2027. Penalties for non-compliance include fifth-class fines for offenses such as failing to conduct leak tests, illegal degassing, or placing prohibited equipment on the market. Third-class fines apply to distributors who fail to maintain registers or submit annual declarations. Repeat offenses face punishment under Articles 132-11 and 132-15 of the Penal Code.

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

Italy

Amendments to restrictions on the use of certain hazardous substances in electrical and electronic equipment to update, restructure, and provide time-limited exemptions for lead used as an alloying element in steel, aluminum, and copper (published)

On 24 June 2026, Italy published the Decree of 7 May 2026 implementing the European Commission Delegated Directives (EU) 2025/1802, 2025/2363 and 2025/2364. The Decree amends Annex III to Legislative Decree No. 27 of 4 March 2014, which implements the European Union (EU) Restriction of Hazardous Substances (RoHS) Directive for electrical and electronic equipment. The amendments update, restructure, and provide time-limited exemptions for lead used as an alloying element in steel, aluminum, and copper in high-melting-temperature solders, semiconductor assemblies, printed circuit boards, glass and ceramic components, piezoelectric devices, and certain capacitors.

For steel and metal alloys, the amendments provide, among other changes:

- » expiry of the existing exemption for lead in machining and galvanized steel containing up to 0.35% lead on 11 December 2026
- » exemptions until 30 June 2027 for lead in machining steel containing up to 0.35% and batch hot-dip galvanized steel containing up to 0.2%
- » category-specific expiry dates for lead in recycled aluminum and aluminum used for machining
- » a new exemption until 30 June 2027 for recycled aluminum casting alloys containing up to 0.3% lead
- » an exemption until 30 June 2027 for copper alloys containing up to 4% lead by weight

Certain alloy exemptions do not apply to electrical and electronic equipment intended for the public where the equipment or an accessible part can be placed in a child's mouth under normal or reasonably foreseeable conditions. These exemptions may nevertheless apply where the prescribed lead-release limit is met and, for coated articles, the coating ensures compliance with that limit for at least two years under normal or reasonably foreseeable conditions of use.

The general exemption for lead in high-melting-temperature solders, meaning lead-based alloys containing at least 85% lead by weight, expires on 30 June 2027. More specific exemptions under entries 7(a)-I to 7(a)-VII apply until 31 December 2027. All exemptions under entries 7(a) to 7(a)-VII apply to all EEE categories, except applications covered by Entry 24 of Annex III.

These exemptions cover defined uses in semiconductor assemblies, die-attach connections, first-level and second-level solder joints, ceramic ball-grid arrays, high-temperature plastic overmouldings, hermetic sealing, specified lamp connections, and high-temperature audio transducers.

For glass and ceramic components, entry 7(c)-I applies until 30 June 2027 to electrical and electronic components containing lead in glass, ceramic other than dielectric ceramic in capacitors, or a glass or ceramic matrix compound. Entry 7(c)-II applies until 31 December 2027 to lead in dielectric ceramic in capacitors with a rated voltage of 125 V AC, 250 V DC or higher, except applications covered by entries 7(c)-I and 7(c)-IV. New entries 7(c)-V and 7(c)-VI also apply until 31 December 2027. Entry 7(c)-V covers specified uses of lead in glass or glass matrices, including high-voltage diode glass beads, wafer glass layers, hermetic seals, specified bonding applications, resistive materials, and certain chemically modified glass surfaces. Entry 7(c)-VI covers lead in ceramics used in lead zirconate titanate piezoelectric ceramics and ceramics providing a positive temperature coefficient, subject to the exclusions specified in Annex III and Annex IV.

Expiry of an exemption does not automatically prohibit all EEE containing lead. It means that the specified use can no longer rely on that exemption. After the relevant expiry date, the equipment must comply with the general RoHS lead concentration limit or qualify for another applicable exemption.

Penalties are not mentioned in the update. More information can be found in Italian in the [official gazette](#).

United Kingdom

Updated approach to deforestation regulations (published)

The United Kingdom (UK) government published its updated [approach to deforestation regulations](#) on June 23, 2026, outlining plans to introduce a mandatory due diligence regime targeting forest-risk commodities in supply chains. The policy builds on the existing UK Timber Regulation and is intended to reduce the UK's contribution to global deforestation while supporting its commitment to halt and reverse forest loss by 2030. The proposed framework would apply to businesses in Great Britain with annual turnover exceeding £1 million that use specified commodities, including cattle, cocoa, coffee, palm oil, rubber, soy, wood, and certain derived products. Businesses would be required to establish due diligence systems to ensure commodities are produced in compliance with local laws, maintain traceability, and report on their activities.

Under the proposed approach, companies would need to collect supply chain information, including geolocation data, to demonstrate compliance with the regime designed to operate consistently with the European Union Regulation on Deforestation-free Products while initially focusing on illegal deforestation rather than a broader deforestation-free standard. The policy remains subject to consultation and further legislation before becoming enforceable, with implementation expected in 2027. The source does not specify any fines or penalties for non-compliance at this stage,

although related Environment Act provisions indicate that civil sanctions and monetary penalties may be introduced once implementing legislation is finalized.



NORTH AMERICA

Canada

Assessment summaries for thirteen substances in the Titanium-Containing Substances Group (published)

On 20 June 2026, the Minister of the Environment and the Minister of Health published an [assessment summary](#) for thirteen substances in the Titanium-Containing Substances Group under the Canadian Environmental Protection Act, 1999 (CEPA). The Ministers concluded that these substances do not meet the criteria under section 64 of CEPA. The annex provides a summary table of the thirteen evaluated substances. The table details their CAS numbers, Domestic Substances List names, and common names. The specific substances are:

- » 2-propanol, titanium (4+) salt (titanium tetraisopropanolate) (CAS No. 546-68-9)
- » 1-hexanol, 2-ethyl-, titanium (4+) salt (titanium tetrakis(2-ethylhexanolate)) (CAS No. 1070-10-6)
- » rutile (TiO₂) (CAS No. 137-80-2)
- » titanium oxide (Ti₂O₃) (dititanium trioxide) (CAS No. 1344-54-3)
- » titanium oxide (TiO₂) (titanium dioxide) (CAS No. 13463-67-7)
- » butanol, titanium (4+) salt (titanium tetrabutanolate) (CAS No. 5593-70-4)
- » titanium tetrachloride (CAS No. 7550-45-0)
- » titanium chloride (TiCl₃) (titanium trichloride) (CAS No. 7705-07-9)
- » titanate (TiO₃²⁻), barium (1:1) (barium titanate IV) (CAS No. 12047-27-7)
- » titanate (TiO₃²⁻), strontium (1:1) (strontium titanium oxide) (CAS No. 12060-59-2)
- » titanium, oxo[sulfato(2-)-O,O']- (titanium oxide sulphate) (CAS No. 13825-74-6)
- » titanate (2-), hexafluoro-, dipotassium, (OC-6-11)- (dipotassium hexafluorotitanate) (CAS No. 16919-27-0)
- » titanium hydroxide (Ti(OH)₄), (T-4)- (tetrahydroxytitanium) (CAS No. 20338-08-3)

Sector uses include metal mining and refining, textiles and apparel, paints, coatings, and adhesives, building materials and electronics, food packaging and permitted food additives, self-care, and cleaning products.

The notice publishes a final assessment summary and no new regulatory requirements, changes, or exemptions are introduced. There are no penalties specified in this update.

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

The Government of Canada published three related orders under the Canadian Environmental Protection Act, 1999 to amend Canada's chemical substance inventories. [SOR/2026-115](#) adds eight chemicals and polymers to the Domestic Substances List (DSL), [Order 2026-87-07-02](#) removes five of those substances from the Non-domestic Substances List (NDSL), and [SOR/2026-90](#) adds one substance to the DSL with Significant New Activity (SNAC) requirements.

The DSL serves as Canada's marketplace inventory. Once substances are added to the DSL, they are no longer subject to pre-manufacture or pre-import notification under the new-substances regime in the New Substances Notification Regulations, unless separate requirements such as SNAc provisions apply.

SOR/2026-115

This update adds eight chemicals and polymers to the DSL without restriction. The five substances added to Part 1 include:

- » CAS No. 623-53-0
- » CAS No. 34398-05-5
- » CAS No. 73038-32-1
- » CAS No. 91001-61-5
- » CAS No. 2561414-35-3

The three substances added to Part 3 are identified by masked names and Confidential Accession Numbers (CANs):

- » carbamic acid, N -[3-[poly(substitutedalkyl)amino]propyl]-, 2-hydroxy-1-methylethyl ester, polymer with 2-hydroxypropyl N -[3-[poly(substitutedalkyl)amino]propyl]carbamate and polymethylenepolyphenylene isocyanate, 2-propoxyethanol-blocked (CAN 19371-9 N).
- » carbomonocyclicdisulfonic acid, [1,2-ethenediylbis[(3-sulfo-4,1-phenylene)imino[6-[(2-sulfoethyl)amino]-1,3,5-triazine-4,2-diyl]imino]], bis-, sodium salt (1:8) (CAN 19835-3 N).
- » alkanic acid, substituted, polymer with disubstituted-ketone, metal salt (CAN 19836-4 N-P).

Order 2026-87-07-02

This related update removes the five Part 1 substances listed above from Part I of the NDSL, reflecting their transfer from NDSL status to DSL status.

SOR/2026-90

This update adds SNAc reporting obligations to Division 1 of Part 2 of the DSL for stannate ($\text{Sn}(\text{OH})_6^{2-}$), zinc (1:1), (OC-6-11)- (CAS No. 12027-96-2).

Until 7 March 2027, the prescribed information must be provided to the Minister at least 90 days before i) using the substance to manufacture consumer products that release or spray the substance in airborne particles, where the total quantity used in all such products in a calendar year is greater than 1,000 kilograms (kg); ii) importing the substance in such consumer products, where the total quantity imported in a calendar year is greater than 1,000 kg; or iii) conducting any other activity involving the substance, where the total quantity involved across all other activities in a calendar year is greater than 100 kg.

For other activities, the SNAc requirement applies only where the substance has a primary particle size distribution meeting at least 10% of particles by number have a dimension between 1 and 100 nanometers (nm), or at least 1% of particles by mass have a dimension between 1 and 100 nm.

From 8 March 2027, revised SNAc provisions apply to use of the substance in the manufacture of consumer products that release or spray the substance in airborne particles, import of the substance in such products, and other activities involving more than 100 kg/year. The period from 1 January 2027 to 7 March 2027 is excluded from the relevant calendar-year calculation.

Exemptions apply where the substance is a research and development substance, a site-limited intermediate, or where the substance or product containing it is intended only for export.

United States

Updates to the Emergency Planning and Community Right-to-Know Act (EPCRA) hazardous chemical inventory reporting regulations (published)

The Environmental Protection Agency (EPA) updated the Emergency Planning and Community Right-to-Know Act (EPCRA) hazardous chemical inventory reporting regulations. The [final rule](#) aligns EPCRA hazardous chemical inventory reporting requirements with the Occupational Safety and Health Administration's (OSHA's) 2012 and 2024 Hazard Communication Standard amendments. The update aims to harmonize hazard terminology and reporting requirements, improve consistency in chemical inventory reporting, reduce reporting burdens, and enhance information available to emergency responders and communities. Key changes include:

- » Direct incorporation of OSHA hazard categories: The update replaces EPCRA's 24 broad hazard categories with the OSHA hazard categories, requiring facilities to report the applicable hazard classifications listed in Section 2 of the Safety Data Sheet (SDS).
- » Removal of "MSDS" terminology: The term "Material Safety Data Sheet (MSDS)" has been replaced with "Safety Data Sheet (SDS)," aligning the terminology with OSHA's Hazard Communication Standard
- » Revised and relocated definitions: The rule updates the definitions of "hazard category," "health hazard," and "physical hazard" to align with the 2024 OSHA Hazard Communication Standard, explicitly includes Hazards Not Otherwise Classified (HNOC) as EPCRA hazard categories, and reorganizes the definitions within the regulation to improve clarity.
- » Plain language and administrative clean-up: The update makes minor editorial changes by improving terminology, removing outdated compliance references, and simplifying regulatory language to enhance clarity and readability.

The final rule takes effect on 21 August 2026. Facilities must comply with the updated hazard-category reporting requirements from 1 January 2028. EPA expects these changes to be reflected in 2027 EPCRA section 312 annual reports due on 1 March 2028. Facility owners or operators must certify their inventory information "under penalty of law."

Draft technical support documents for risk evaluations of five compounds (draft)

The Environmental Protection Agency (EPA) has released [draft technical support documents](#) for the Toxics Substances Control Act risk evaluations of five chemicals and opened them for public comment and independent scientific peer review by the Science Advisory Committee on Chemicals (SACC). The chemicals are:

- » 1,1,2-trichloroethane (CAS No. 79-00-5) – comments are due 60 days after release on 17 July 2026
- » 4,4'-(1-methylethylidene)bis[2, 6-dibromophenol] (TBBPA) (CAS No. 79-94-7) – comments are due 60 days after release on 29 July 2026
- » 1,2-dichloropropane (CAS No. 78-87-5) – comments due on 23 July 2026
- » ethylene dibromide (1,2-dibromoethane) (CAS No. 106-93-4) – comments due on 23 July 2026
- » trans-1,2-dichloroethylene (CAS No. 156-60-5) – comments due on 23 July 2026

The draft documents include technical information such as human health, environmental hazard, and exposure assessments to support EPA's draft risk evaluations.

EPA is seeking comments on the scientific methods, analyses, and draft charge questions that will be considered during the SACC peer review.

Risk management rule for legacy uses and associated disposals of asbestos (published)

The Environmental Protection Agency (EPA) has published a [request for information](#) (RFI) to support the development of the Toxics Substances Control Act (TSCA) risk management rule for legacy uses and associated disposals of asbestos (Asbestos Part 2). The request covers chrysotile asbestos, non-chrysotile asbestos fiber types, and asbestos-containing talc. It does not introduce new regulatory requirements.

EPA is seeking information to improve the exposure and economic analyses supporting the proposed risk management rule. The agency requests information on:

- » activities that disturb asbestos-containing materials, including renovation, demolition and repair
- » work involving asbestos-containing materials performed by self-employed individuals
- » use of legacy asbestos-containing products, including construction materials
- » air-sampling methods
- » laboratory capabilities for asbestos analysis

EPA states that it will use the information to better understand who may be exposed, how often exposure may occur, the conditions under which exposure occurs, and the costs and benefits of potential risk management measures.

Under TSCA Section 6(c)(1)(C), EPA has adjusted the deadline for proposing the risk management rule to allow additional data collection. EPA intends to publish the proposed rule by 3 June 2027. The notice is an information-gathering exercise and does not establish reporting, labeling, restriction, or authorization requirements.

Delaware to restrict the use and sale of firefighting foam containing intentionally added per- and polyfluoroalkyl substances (effective)

The State of Delaware has advanced [House Substitute 1 for House Bill 356](#), which would restrict the use and sale of firefighting foam containing intentionally added per- and polyfluoroalkyl substances (PFAS). The proposal aims to reduce environmental contamination and potential human exposure to PFAS while providing transitional exemptions for certain bulk petroleum facilities that continue to rely on PFAS-containing firefighting foams.

The bill amends Title 16 of the Delaware Code and establishes requirements covering the sale, recall, and use of PFAS-containing Class B firefighting foam, exemptions for bulk petroleum facilities, manufacturer notification obligations, and disclosure requirements for firefighting personal protection equipment (PPE) containing PFAS. House Substitute 1 modifies the original bill by broadening the exemption category from “terminal” facilities to “bulk petroleum facilities”, extending exemption periods, clarifying PFAS definitions, and removing provisions requiring state assistance in sourcing PFAS-free firefighting foam, and permitting a bulk petroleum facility to use PFAS-containing firefighting foam to aid another facility.

The bill would prohibit the sale of Class B firefighting foam containing intentionally added PFAS from 1 January 2028. Bulk petroleum facilities may apply to the Delaware Department of Natural Resources and Environmental Control (DNREC) for a five-year exemption, which may be extended in two-year increments up to a total of thirteen years. If an exempt bulk petroleum facility uses the firefighting foam containing PFAS chemicals, they are legally required to notify DNREC.

Manufacturers must notify Delaware customers of the prohibition by 1 January 2027 and, by 1 March 2028, must recall PFAS-containing foam, or reimburse purchasers unless the purchaser qualifies for an exemption. Recalling programs must include safe transport and storage arrangements until an approved disposal technology becomes available. The bill also requires firefighting PPE containing PFAS to be sold with written notification identifying PFAS content, and manufacturers or sellers must retain records of such notices for at least three years.

House Substitute 1 passed the Delaware House of Representatives on 9 June 2026 and is currently awaiting consideration by the Senate Health & Social Services Committee. If adopted, manufacturers, distributors, firefighting equipment suppliers and exempt petroleum facilities will need to prepare for notification, recall, recordkeeping and compliance obligations ahead of the 2027 and 2028 implementation dates.

Penalties for firefighting foam violations include civil penalties of not more than \$5,000 for a first occurrence and not more than \$10,000 for a second or subsequent occurrence, plus costs. Failure to provide the required PFAS notice for firefighting PPE is subject to a civil penalty of \$100 per occurrence.

California proposed changes to the implementation of the Corporate Greenhouse Gas Reporting Program under Senate Bill 253 (proposal)

The California Air Resources Board (CARB) issued a [regulatory update](#) on June 24, 2026, outlining proposed changes to the implementation of the Corporate Greenhouse Gas Reporting Program under Senate Bill 253. The update proposes to defer the first-year reporting deadline for Scope 1 and Scope 2 greenhouse gas emissions from 10 August 2026 to 10 November 2026, providing reporting entities with additional time pending final approval of the implementing regulation. The program applies to U.S.-based companies doing business in California with annual revenues exceeding \$1 billion and requires annual disclosure of greenhouse gas emissions as part of the state's climate disclosure framework.

CARB also confirmed that it has withdrawn its previously submitted Initial Regulation to allow for limited revisions to clarify reporting requirements, which will be released for stakeholder input through a forthcoming fifteen-day public comment period before resubmission for approval. While the regulatory scope and core obligations remain unchanged, the update signals that reporting requirements are still being finalized ahead of initial compliance. The source does not specify any fines or penalties for non-compliance in this update, although the underlying statute establishes mandatory reporting requirements that are expected to be enforceable once finalized.

Plastic Pollution Prevention and Packaging Producer Responsibility Act (proposal)

On 1 May 2026, the Office of Administrative Law approved California's permanent implementing regulations for [Senate Bill 54](#), the Plastic Pollution Prevention and Packaging Producer Responsibility Act, and filed them with the Secretary of State. The regulations entered into force on the same date and established the operational framework for California's packaging extended [producer responsibility program](#), including producer registration, compliance pathways, reporting, Producer Responsibility Organization requirements, program planning, compliance monitoring, and enforcement.

CalRecycle has approved Circular Action Alliance as California's first Producer Responsibility Organization. Producers of covered materials were required to register and take the applicable compliance-pathway action within thirty days after 1 May 2026, either by applying to participate in Circular Action Alliance's plan, applying to comply independently or seeking a small-producer exemption where eligible. Circular Action Alliance submitted its Producer Responsibility Organization Plan to the SB 54 Advisory Board on 15 June 2026. The Advisory Board has sixty calendar days to review the plan and provide comments, while public comments are being accepted until 14 August 2026.

SB 54 establishes phased targets for plastic covered material. A 10% source reduction applies from 1 January 2027, followed by a 30% recycling rate from 1 January 2028. From 1 January 2030, the source-reduction target increases to 20% and the recycling-rate target to 40%. By 1 January 2032, plastic covered material must achieve a 25% source reduction and a 65%

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recycling rate, while all covered material offered for sale, distributed or imported in or into California must be recyclable or eligible to be labeled compostable.

Non-compliance may result in administrative civil penalties of up to US\$50,000 per day per violation, or up to US\$25,000 per day per violation where the applicable statutory criteria are met.



SOUTH AMERICA

Brazil

Establishment of maximum permitted limit of lead in paints and similar surface coating materials (in force)

Brazil enacted Law No. 15,441 of 26 June 2026, establishing maximum lead concentrations for paints and similar surface-coating materials. The Law was officially published on 29 June 2026 and will enter into force on 29 June 2027, replacing Law No. 11,762 of 1 August 2008.

The Law prohibits the manufacture, commercialization, distribution, and importation of paints and similar surface-coating materials containing lead at concentrations equal to or greater than 90 parts per million (ppm), expressed as metallic lead and measured on a dry-weight or total non-volatile-content basis. Covered products include varnishes, lacquers, sealants, enamels, primers, waterproofing products, stains, textures, and other materials used to protect, prepare or finish surfaces.

Certain industrial and marine paints may contain up to 600 ppm of lead. This exception applies to biocide-based antifouling paints containing copper oxide and anticorrosive paints containing zinc powder. Compliance must be demonstrated through laboratory testing in accordance with applicable national or international technical standards. Products manufactured, imported or already undergoing importation before the Law enters into force are excluded from the restriction.

Although the prohibition covers manufacturing, commercialization, distribution and importation, the Law expressly assigns non-compliance penalties to manufacturers and importers. These penalties include notification, seizure of the product and a fine equivalent to the value of the seized goods, without prejudice to any applicable civil or criminal sanctions.

The text of the law can be found [here](#) in Portuguese.

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