Newsletter

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

IAEG

Vol.6, Issue 3

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 3 – 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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ASIA

China

Management of ozone-depleting substances and hydrofluorocarbons (in effect)

On 12 February 2026, China's Ministry of Ecology and Environment (MEE) published a notice to strengthen full-chain management of ozone-depleting substances and hydrofluorocarbons (HFCs) listed in the List of Controlled Ozone-Depleting Substances in China. The notice introduces requirements covering production, sale, use, repair, end-of-life treatment, recovery, reclamation, and destruction of controlled substances.

The notice strengthens production quota licensing and sales and use filing requirements and requires relevant entities to maintain original records and submit data through the ozone-depleting substances information management system. It also introduces filing requirements for entities involved in repair, end-of-life treatment, recovery, reclamation, and destruction activities, and includes additional monitoring and reporting obligations for certain by-product substances, including carbon tetrachloride and HFC-23.

The notice identifies key violations for enforcement focus, including unlicensed or excess production or sale, unlawful sale or purchase, unlicensed use, failure to file, failure to retain records, failure to report data on time, false or concealed reporting, and failures relating to automatic monitoring equipment. The notice states that violations shall be managed in accordance with the law. It also provides that suspected criminal violations must be transferred to the judicial authorities.

More information can be found in Chinese in this notice from MEE.

Limits on prohibited and restricted substances in artificial leather and synthetic leather (consultation)

On 30 January 2026, China's national standards authorities announced that public opinions are being solicited on eleven proposed mandatory national standard projects, including limits on prohibited and restricted substances in artificial leather and synthetic leather. The update describes this item as a mandatory national standard revision proposed by the Ministry of Industry and Information Technology and entrusted to TC48 (i.e., the National Technical Committee on Standardization of Plastic Products).

The update states that the revision expands the scope from polyvinyl chloride (PVC) artificial leather to artificial leather and synthetic leather products. It specifies requirements for limits of prohibited and restricted substances, describes corresponding test methods, and provides sampling rules, inspection rules, traceability, product information, implementation and supervision, and legal responsibilities. It applies to the production, inspection, sale, and import of artificial leather and synthetic leather products, and references the development, production, inspection, sales, and service of these products.

The update lists newly added prohibited or restricted substances and related testing methods, including asbestos, hydrolyzed and free formaldehyde, polybrominated biphenyls (PBBs), polybrominated diphenyl ethers (PBDEs), phthalates, extractable heavy metals, soluble hexavalent chromium, soluble mercury, volatile organic compounds, polycyclic aromatic hydrocarbons, perfluorinated compounds, chlorinated paraffins, dimethylformamide (DMFa), and azodicarbonamide. The

update also states that limits and test methods for other volatile substances are removed. The stated reason for mandatory enforcement is ecological and environmental safety.

The deadline for comments was 1 March 2026. More information can be found here in Chinese.

India

Release of the third edition of the National Circular Economy Framework (NCEF-3) (published)

The Confederation of Indian Industry (CII) has released the third edition of the National Circular Economy Framework (NCEF-3), expanding India's circular economy roadmap to twenty priority material categories including tires and rubber, hazardous chemicals, plastics, metals, textiles, paper and cardboard, solar panels, and catalytic converters. The framework shifts from identifying gaps to detailing implementation strategies, with most measurable targets set for 2030 and extended horizons to 2035, 2040, and 2047.

NCEF-3 proposes material-specific policy measures, including recycled-content mandates, standardization of processes, regulatory harmonization, enhanced transparency for hazardous chemicals, and incentives for advanced recycling technologies. It aligns with national sustainability initiatives and aims to strengthen domestic resource security, reduce waste generation, and improve environmental and health outcomes.

Each material stream follows a consistent structure outlining lifecycle assessment, current gaps, future vision, quantitative targets, and policy enablers. The framework provides recommended regulatory, economic, and operational measures to support circularity at both industry and governmental levels.

While NCEF-3 is a policy framework rather than binding legislation, it proposes several recommended measures including:

- a 10% recycled-content requirement for new tires by 2030, supported by labeling requirements
- mandated use of recycled rubber in public procurement and increased use of crumb rubber-modified bitumen in road construction
- adoption of REACH-based approaches for identifying and substituting substances of very high concern in hazardous chemical management
- regulation of hazardous chemicals based on "essential use" principles and grouped substance approaches
- incentives for chemical and advanced recycling in plastics and potential bans on non-recyclable multilayer films and recycling-inhibiting additives
- development of Bureau of Indian Standards notifications for recycled content in polyethylene terephthalate (a.k.a. PET) and high-density polyethylene (a.k.a. HDPE) applications
- the framework emphasizes improved traceability, harmonized standards, transparency in supply chains, and regulatory consistency to enable circular implementation

NCEF-3 provides a comprehensive industry-government roadmap to accelerate India's circular economy transition, with key targets primarily focused on 2030 and longer-term alignment toward 2047 national development goals. As a non-binding framework, it does not introduce direct legal obligations or penalties but is intended to guide future regulatory development and industry adoption.

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Standards on technical specifications for purified isophthalic acid (draft)

In January 2026, the Bureau of Indian Standards opened a consultation on a draft standard establishing technical specifications for purified isophthalic acid, a substance used in the manufacture of polyethylene terephthalate (a.k.a. PET) packaging, unsaturated polyester resins, and coating resins. Comments were due on 8 March 2026. The proposal introduces quality and impurity limits, including maximum thresholds for ash content and specific metals, as well as a combined metals limit of 10 parts per million and a minimum purity requirement of 99.88% by mass.

The draft standard also sets requirements for product characteristics, testing, packing, and marking, requiring packages to display manufacturer information, production date, net mass, and batch identification.

Japan

Manual outlining procedures for use of substitute chemical names in safety data sheets for trade secret ingredients (published)

In March 2026, Japan's Ministry of Health, Labor, and Welfare published a manual (can also be found here in Japanese) outlining procedures for the use of substitute chemical names in Safety Data Sheets (SDS) where ingredient identities qualify as trade secrets. The guidance supports implementation of amendments to the Industrial Safety and Health Act (Article 57-2) introduced under Act No. 33 of 2025, effective 1 April 2026.

The measure aims to balance protection of confidential business information with the need to ensure adequate hazard communication for workers and medical professionals. The use of substitute names is limited to lower-hazard substances and does not remove obligations to disclose full chemical identities in emergency situations. The manual is structured across core sections covering eligibility criteria, trade secret definitions, substitute name creation methodology, SDS requirements, notification procedures, and record-keeping obligations.

An appendix provides standardized generic naming conventions for inorganic and organic substances, aligned in part with European Union guidance. Supporting materials include a sample SDS entry, a record-keeping template, and six worked examples demonstrating substitution approaches for different chemical types.

Use of substitute names is permitted only where strict eligibility criteria are met, including exclusion of substances subject to specific regulatory controls, and those that meet defined globally harmonized system hazard classifications such as carcinogenicity, mutagenicity, reproductive toxicity, or high acute toxicity categories. Substances must also be below applicable concentration limits for hazard classification while still exceeding SDS disclosure thresholds.

A structured methodology is introduced requiring selection of structurally meaningful names, identification of key chemical elements, and masking of one or two elements using generalization or deletion techniques. Hazard-relevant functional groups must not be masked, ensuring hazard communication is preserved. Where masking cannot sufficiently prevent identification, information on effects on the human body may be notified instead.

SDS requirements include clear identification of trade secret components, expression of concentration ranges in standard increments, and inclusion of a 24-hour emergency contact for disclosure to medical professionals. Companies may implement internal identification systems linking substitute names to actual substances.

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Record-keeping obligations require retention of detailed documentation, including true identities, substitution rationale, and notification records, for five years. Mandatory disclosure of true identities applies in medical emergencies.

The manual provides the operational framework for implementing substitute chemical name provisions under Japan's updated Industrial Safety and Health Act, effective 1 April 2026. It introduces a tightly controlled system limited to low-hazard substances, with safeguards to ensure transparency in risk communication and emergency response. Penalties for non-compliance are not mentioned in the guidance manual.

Amendment to the rules for public disclosure of names of new chemical substances (consultation)

On 11 March 2026, the Japanese government has opened a public consultation on a draft ministerial ordinance (can also be found here in Japanese) amending the rules for publicly disclosing the names of new chemical substances. Previously, the names of notified new chemical substances were published five years after notification to avoid placing the first notifier, who bore the testing costs, at a competitive disadvantage. The amendment introduces differentiated timelines: substances assessed as low risk under Item 5 will have their names published after 10 years, while substances under Items 2–4 will remain at five years.

The amendment also clarifies the method of public notice. While previously published in the Official Gazette, notices may now be posted online via ministry websites to improve accessibility. The draft aims to encourage the development of safer chemicals while maintaining transparency for regulated substances.

The portal for public comments can be found here in Japanese. An overview of the draft ordinance can be found here in English and in Japanese. Comments were due on 10 April 2026.

Amendment to the test methods and criteria for determining whether a substance is a new chemical substance or a monitored chemical substance (draft)

Japan's Ministry of Economy, Trade and Industry, together with the Ministry of the Environment and the Ministry of Health, Labor and Welfare, has opened a public consultation on a draft amendment to the test methods and criteria used to determine whether a new chemical substance qualifies as a monitored chemical substance under the Chemical Substances Control Law. The proposed revision updates evaluation approaches and clarifies how existing knowledge regarding a substance's composition, properties and hazard information may be considered during regulatory assessments, with the aim of improving consistency and scientific accuracy in substance classification decisions.

The amendment forms part of Japan's ongoing review of chemical substance assessment procedures and is intended to support more efficient regulatory decision-making while maintaining environmental and human health protections. The consultation was published on 19 February 2026, and comments were due on 20 March 2026.

More information can be found here in Japanese.

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Updating instruments under the Export Trade Control Order regarding regulations on export of specific goods and chemical substances from Japan (consultation)

On 2 March 2026, the Ministry of Economy, Trade, and Industry (METI) has opened a consultation for an initiative aiming to update instruments under the Export Trade Control Order, which regulates the export of specific goods and chemical substances from Japan (comments were due on 31 March 2026).

The initiative will add perfluorohexane sulfonic acid (PFHxS; CAS No. 355-46-4)-related substances and products containing them to the list of goods requiring prior METI export approval, with the aim of aligning Japan's export regulations with the Stockholm Convention on Persistent Organic Pollutants. Manufacturers, distributors, and exporters of specific goods will be directly affected, as export approval will be required for products including: water- and oil-repellent treated textiles, clothing, and floor coverings; metal processing etching agents; semiconductor manufacturing materials (such as etchants, photoresists, and anti-reflection agents); plating surface treatment agents and additives; water- and oil-repellents and textile protection agents; and fire extinguishers and firefighting foams.

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

Philippines

Philippines Financial Reporting Standards on sustainability disclosure (adopted)

On 23 December 2026, the Securities and Exchange Commission (SEC) published Memorandum Circular No. 16, Series of 2025, adopting the Philippines Financial Reporting Standards (PFRS) on sustainability disclosure and financial reporting. The PFRS establish a general framework for publicly listed companies (PLCs) and large non-listed entities (LNLs) in the Philippines to report on sustainability-related financial information, aligned with international standards. The mandatory adoption begins in fiscal year 2026 under a tiered rollout based on market capitalization or annual revenue. The framework applies uniformly to all covered entities without sector-specific provisions; thus, aerospace and defense manufacturers operating in the Philippines or listed on the Philippine Stock Exchange that qualify as PLCs or LNLs would be subject to the same general requirements for sustainability-related financial disclosures and climate-related reporting as other industries. This includes mandated external limited assurance for Scope 1 and 2 greenhouse gas emissions two years after initial implementation, along with transition reliefs (e.g., delayed Scope 3 reporting and optional non-greenhouse gas protocol methodologies). The regulation, issued on December 22, 2025, became effective 15 days after its publication in two newspapers of general circulation—likely mid-January 2026 (around January 8–10, based on news coverage starting December 24, 2025).

Non-compliance is explicitly penalized for PLCs. Companies that fail to attach a Sustainability Report to their Annual Report or do not comply with Philippine Financial Reporting Standards S1 and S2 will be subject to the SEC's penalties for Incomplete Annual Reports under SEC Memorandum Circular No. 6 (Series of 2005) and updated scaling under SEC Resolution No. 581 (Series of 2021). These sanctions include fines for late or missing sustainability submissions. While specific penalties for LNLs will be set in future issuances, both PLCs and LNLs are obligated to maintain ongoing annual reporting once classified under a tier. Aerospace and defense firms in the Philippines that qualify as PLC or LNL fall under the general scope of the PFRS S1 and S2 sustainability disclosure requirements, which cover topics including emissions, supply chains, and climate-related risks.

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Saudi Arabia

Amendments to the Technical Regulation for Glue and Adhesive Materials (consultation)

Saudi Arabia notified the World Trade Organization (WTO) of proposed amendments to the Technical regulation for glue and adhesive materials (can also be found here in Arabic). The notification was circulated on 2 March 2026, and the consultation period is open for 60 days (1 May 2026) from the date of notification. The proposed changes aim to align the provisions of the existing technical regulation with the recently issued Product Safety Law, ensuring consistency between product safety legislation and the regulatory framework governing adhesives and glue materials.

The modification updates the scope and provisions of the technical regulation to reflect requirements introduced under the Product Safety Law. The updated regulation, and the associated list of applicable standards, have been made available as part of the consultation documents. The regulation applies to glue and adhesive materials placed on the Saudi market and aims to ensure that such products comply with relevant safety and regulatory requirements. Stakeholders are invited to review the revised regulatory text and provide comments during the consultation period.

South Korea

Amendments to the Regulations on the Preparation of Chemical Accident Prevention Management Plans (draft)

The National Institute of Chemical Safety (NICS) opened on 27 February 2026 public consultation on draft amendments to the Regulations on the Preparation and the Review of Chemical Accident Prevention Management Plans (comments were due on 13 March 2026). The amendments aim to align the regulations with revisions to the Chemical Substances Management Act adopted on 7 August 2025.

The draft amendments introduce updated definitions, clarify the scope of application of the regulations, expand exemptions for certain facilities, and add provisions intended to reduce duplication with other laws.

More information can be found in Korean in these notices regarding Amendments to Regulations on the Review of Chemical Accident Prevention Management Plan and Amendment to the Regulations on the preparation of the Chemical Accident Prevention Management Plan.

Roadmap for mandatory sustainability reporting beginning in 2028 (draft)

South Korea's Financial Services Commission has released a draft roadmap proposing mandatory sustainability reporting aligned with ISSB[1] standards (equivalents to IFRS S1 and S2), with an initial "climate-first" focus on climate-related disclosures while non-climate issues remain optional. The requirement targets KOSPI[2]-listed companies on a sector-agnostic basis.

Large firms with assets exceeding KRW 30 trillion are proposed to begin reporting in 2028 (based on 2027 fiscal data), including a three-year transitional relief deferring mandatory Scope 3 greenhouse gas emissions disclosure to support

[1] ISSB = International Sustainability Standards Board.
[2] KOSPI = Korea Composite Stock Price Index.

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infrastructure development. In 2029, the threshold is proposed to expand to companies with assets over KRW 10 trillion, with potential further phases for smaller entities depending on market readiness and international developments.

For aerospace and defense entities with KOSPI listings or substantial operations in South Korea, this draft would necessitate enhanced climate data collection, governance, and disclosure capabilities—especially relevant amid the sector's supply chain emissions and resource demands—while non-listed or smaller firms below thresholds would face no immediate obligations under the current proposal.

While no specific penalties for non-compliance are outlined in the draft proposals, enforcement is described as adopting a gradual, guidance-focused approach rather than immediate sanctions. Third-party assurance on disclosures is proposed to start as optional, with gradual mandatory adoption to be considered in alignment with global trends. The draft roadmap is planned for finalization in April 2026 following the ongoing public consultation.

Amendment of the Enforcement Decree of the Act on Registration and Evaluation of Chemical Substances (draft)

The Republic of Korea has notified the WTO of a draft partial amendment to the Enforcement Decree of the Act on Registration and Evaluation of Chemical Substances (K-REACH). The proposed amendment (comments due on 14 April 2026) clarifies and expands the scope of duties of an only representative appointed by a foreign manufacturer or producer. The amendment adds responsibilities relating to dispute conciliation for joint data submission or joint data use in the preparation of registration dossiers, as well as matters concerning deferral of data submission. These responsibilities will also fall within the scope of the Chemical Substance Information Processing System. In addition, the amendment expands the scope of the small and medium enterprise support program under Article 29-2 of the Enforcement Decree.

Taiwan

Amendment to the regulations on restricting the import of mercury-containing products" (draft)

On 12 February 2026, Taiwan's Ministry of Environment (MoE) proposed a draft amendment (can also be found here Chinese) to the Restriction on the Import of Mercury-Containing Products to align domestic law with the United Nations Minamata Convention on Mercury. The proposal introduces a phased expansion of import prohibitions, beginning with eight additional product categories and three types of electronic measuring instruments, including ballasts for general lighting (≤30W), mercury vacuum pumps, tire balancers, and photographic film.

Comments were due on 13 April 2026 (a 60-day public consultation period). The prohibitions are proposed to take effect in stages, starting 1 May 2026, with further lighting bans from 1 January 2027 (compact fluorescent lamps and halophosphate fluorescent lamps for general lighting) and 1 January 2028 (fluorescent lamps using tri-color phosphors).

Conditional exemptions may be granted by the central competent authority, where permitted under Annex A of the Minamata Convention, including for civilian or military protection, research and calibration purposes, or where no technically feasible mercury-free alternatives exist (e.g. high-precision capacitors, certain display lamps, and components for large equipment), subject to submission of supporting documentation.

More information can be found in Chinese in this notice from the MoE.

Amendment to Point 5 of the "Restrictions on the Use of Plastic Trays and Packaging Boxes" (effective)

On 5 March 2026, the Ministry of Environment in Taiwan amended Point 5 (can also be found here in Chinese) of the "Restrictions on the Use of Plastic Trays and Packaging Boxes" to update the obligations for designated public and private venues regarding the formulation and submission of annual plastic reduction plans and results. The amendment came into force on the same day. Based on Article 13 of the Resource Recycling and Reuse Law, this amendment aims to strictly monitor and enforce the reduction of designated plastic containers across various premises by requiring structured, evidence-based reporting.

Designated public and private premises must formulate and submit their reduction plans to the municipal or county competent authorities before 30 November of each year for the following year. Newly established venues are required to submit their reduction plans within two months of receiving notification. If the designated premises are operated in a chain-store model, the head office may compile the reduction plans of all its venues and submit them collectively to the central competent authority. These reduction plans must detail the name, quantity, period, and material for the products to be replaced with an alternative container, as well as items planned to change to not using trays or boxes for packaging. For those who switch to alternative containers, they must provide a list of information on the manufacture, import, sale, and raw material supply of such containers. If a list of suppliers is not provided, the venues must attach proof and a test report that the container material does not contain polyethylene terephthalate, polystyrene, polyvinyl chloride, polyethylene, or polypropylene.

The required test report must be issued by a testing organization that has obtained certification from the National Accreditation Foundation, the International Laboratory Accreditation Cooperation, or is licensed by the central competent authority. Valid testing methods for these materials include Fourier Transform Infrared, Differential Scanning Calorimetry, Nuclear Magnetic Resonance, Pyrolyzer, or Thermogravimetric Analysis. Additionally, venues must submit the previous year's annual reduction results before 31 March of each year. If the competent authority reviews the submitted annual reduction reports and finds the content to be deficient, the designated venue will be notified to make the necessary corrections within seven days.

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

Amendment to “Restrictions on the Manufacture, Import, and Sale of Dry Cell Batteries" (consultation)

On 13 March 2026, the Ministry of Environment published a draft amendments to the "Restrictions on the Manufacture, Import, and Sale of Dry Cell Batteries" (can also be found here in Chinese). Comments are due on 12 May 2026 (60 days from the announcement's official publication date). A primary focus is to align Taiwan's domestic controls with the Minamata Convention on Mercury by adding specific regulatory restrictions for button-type zinc-air batteries. Furthermore, the amendment removes the previous allowance for button-type silver oxide and zinc-air batteries with a mercury content of less than 2%.

Turkey

Announcement regarding the registration of chemical substances within the scope of the Regulation on the Registration, Evaluation, Authorization and Restriction of Chemicals (published)

The Turkish Ministry of Environment, Urbanization, and Climate Change issued an announcement (can also be found here in Turkish) regarding the registration of chemical substances under the Regulation on the Registration, Evaluation, Authorization and Restriction of Chemicals (KKDİK). The notice informs industry organizations about a temporary approach allowing companies to submit individual provisional registrations for chemical substances.

KKDİK establishes requirements for the registration, evaluation and control of chemicals manufactured in or imported into Turkey. Under the regulation, companies must submit registration dossiers for substances they manufacture or import above certain thresholds. Normally, registrations are conducted jointly, with one company acting as the lead registrant and coordinating submissions for other registrants.

According to the announcement, the Ministry established a Chemicals Advisory Group under procedures and principles published on 5 August 2025 to facilitate the effective implementation of KKDİK. Meetings of the group were held on 24 December 2025 and 10, 16 and 18 February 2026. During these discussions, stakeholders highlighted challenges in identifying a lead company responsible for submitting joint registration dossiers. To address these difficulties and enable companies to proceed with the registration process, the Ministry decided to allow the individual submission of provisional registration dossiers. Under this approach:

- companies may submit individual provisional registration dossiers for chemical substances
- submissions must be made through the Ministry's Chemical Registration System
- companies must clearly state the reason the registration is being submitted individually rather than through a joint registration process

The Ministry notes that this measure is intended to provide a practical solution to challenges encountered during the implementation of the registration process and to ensure that registration obligations under the KKDİK Regulation can be completed in a timely manner.

Individual provisional registrations must be completed by 30 September 2026. There are no penalties associated with this announcement, which serves to provide procedural guidance for companies completing registration obligations under the KKDİK Regulation.

More information can be found here in Turkish.

EUROPE

European Union

Approval of a 90% greenhouse gas emission reduction by 2040 (adopted)

The European Union (EU) Member States have given final approval on 5 March 2026 to a legally binding 2040 climate target of 90% net greenhouse gas emissions reduction compared to 1990 levels (with 85% achieved domestically by European industries and up to 5% via international carbon credits paid to developing countries; potential for an additional 5% credits in the future). The target, approved by a reinforced majority of ministers in Brussels, is now entering into EU law as part of the path to net zero by 2050. It includes flexibility mechanisms such as international credits and a one-year delay to 2028 for launching a new EU carbon market.

For aerospace and defense entities operating in, supplying to, or with significant exposure to the EU market, this binding long term goal intensifies pressure on emissions intensive operations (e.g. manufacturing processes, aviation fuels, defense logistics, and global supply chains), likely accelerating decarbonization requirements, carbon pricing exposure, and strategic investments in low carbon technologies, while firms with minimal direct EU footprint may experience primarily indirect effects through trade partners, suppliers, or procurement standards.

Exemption of pallet wrapping and straps from 100% reuse requirement under Packaging and Packaging Waste Regulation (adopted)

On 25 February 2026, the European Commission adopted a Delegated Act exempting pallet wrapping and straps from the 100% reuse requirement under the Packaging and Packaging Waste Regulation (PPWR). The objective of the exemption is to reduce disproportionate adaptation costs for economic operators.

The Delegated Act exempts economic operators that use pallet wrapping and straps to secure goods on pallets during transport within companies, between linked or partner companies, and for deliveries within the same Member State from the 100% reuse requirement. The Commission states that the wider PPWR reuse framework remains in place, including the overall 40% reusability target for transport and sales packaging from 1 January 2030. This marks the first application of a Delegated Act under the PPWR, which entered into force on 11 February 2025.

Harmonized classification and labeling proposals for five substances (consultation)

The European Chemicals Agency (ECHA) launched two targeted harmonized classification and labeling (CLH) consultations under Regulation (EC) No 1272/2008 (CLP). The first concerns glyphosate (CAS 1071-83-6), where the European Commission requested evaluation of new scientific evidence on carcinogenicity following a 2025 published study. The consultation is limited specifically to carcinogenicity and ran from 2 to 31 March 2026. Glyphosate's current Annex VI classification remains Eye Dam. 1 (H318) and Aquatic Chronic 2 (H411), with no existing carcinogenic classification.

The second consultation concerns 1-methylimidazole (CAS 616-47-7), submitted by Norway. Proposed updates include Acute Tox. 3 (H311), Repr. 2 (H361d), alongside existing classifications. The targeted consultation, that was open from 2 to 20 March 2026, specifically sought comment on reproductive toxicity and acute toxicity (oral, dermal and inhalation).

France submitted a proposal to update the Annex VI classification of tebufenpyrad (CAS 119168-77-3), including new classifications for Carc. 2 (H351), Repr. 2 (H361d), STOT RE 1 (H372), and revised skin sensitization and aquatic hazard elements. Whereas a parallel consultation is ongoing concerning its use as a plant protection product, comments on classification must be submitted to ECHA. Comments are due by 2 May 2026.

Germany submitted proposals to amend the classification of methyl-1H-benzotriazole (CAS 29385-43-1) and 1H-benzotriazole (CAS 95-14-7). Proposed updates include Repr. 2 (H361d), acute toxicity classifications, and new environmental hazard categories including PMT/vPvM and endocrine disruption for the environment (ED ENV 1 for 1H-benzotriazole). Comments are due by 4 May 2026.

The Industrial Accelerator Act (draft)

On 4 March 2026, the European Commission announced the Industrial Accelerator Act (IAA) proposal that introduces "made-in-EU" and low-carbon requirements for public procurement in strategic cleantech sectors, alongside measures to address supply chain vulnerabilities, permitting delays, and market distortions. Covered areas include batteries, battery energy storage systems, solar PV, heat pumps, wind, electrolyzers, nuclear technologies, electric vehicles, and electric vehicle components, plus low-carbon/made-in-EU criteria for steel, cement, and aluminum used in automotive, construction, and related applications. The proposal supports decarbonization and resilience in downstream industries that rely on these materials and technologies.

For aerospace and defense entities with EU operations or supply chains, this could create ripple effects through shared inputs (e.g., advanced batteries, low-carbon metals, energy systems), potential future expansions of green procurement rules, and incentives for EU-based low-carbon manufacturing—particularly relevant for firms navigating dual-use technologies or defense procurement alignment with EU sustainability goals.

While no specific penalties or enforcement details are outlined in the proposal (which focuses on procurement incentives and permitting simplification), compliance will be driven through public procurement rules once adopted. The IAA remains at the proposal stage and has been submitted to the European Parliament and Council for negotiation before potential adoption and entry into force.

Czech Republic

Amendments to regulations regarding fluorinated gases and ozone-depleting substances (draft)

The Czech Republic has proposed an amendment (can also be found here in Czech) to align its legal framework with European Union Regulations (2024/573 and 2024/590) to better protect the ozone layer and the climate system from fluorinated greenhouse gases (F-gases) and ozone-depleting substances. The proposed amendment tightens existing rules, introduces bans on marketing certain products that have viable substitutes, and establishes new requirements to prevent harmful emissions. It updates the framework for training, testing, and certifying the personnel and bodies responsible for handling fluorinated-gases and recovered substances, including introducing a novel penalty system where administrative fines are determined based on the actual market value of the illegally handled gases or equipment, ensuring that violators do not profit from illegal conduct.

The amendment is proposed to enter into force on 1 July 2026, in accordance with the Act on the Collection of Laws and International Treaties and the Legislative Rules of the Government.

France

Amendment to the Restrictions of Hazardous Substances implementing measure of 5 March 2020 relating to the limitation of the use of certain hazardous substances in electrical and electronic equipment (in force)

On 16 February 2026, France adopted an Order amending the national Restrictions of Hazardous Substances (RoHS) implementing measure of 5 March 2020 to align domestic legislation with recent European Union (EU) delegated directives updating exemptions for lead under Directive 2011/65/EU on hazardous substances in electrical and electronic equipment (EEE). The amendment updates cross-references contained in Article R.543-171-3 of the Environmental Code following EU-level changes to Annex III of the RoHS Directive.

The amendment modifies Table 1 of the Annex to the 2020 Order by inserting three additional entries referencing newly adopted EU delegated directives concerning specific technical exemptions for lead. Three new exemption references are added, applicable from 1 July 2026, covering:

- lead in high-melting-temperature solder applications (Directive (EU) 2025/1802).
- lead present in glass or ceramic components (Directive (EU) 2025/2363).
- lead used as an alloying element in steel, aluminum, and copper (Directive (EU) 2025/2364).

Producers, importers, and distributors of electrical and electronic equipment must ensure compliance with the updated exemption references when placing products on the French market.

The measure entered into force on 23 February 2026, with the updated exemptions applying from 1 July 2026. No new penalties are introduced; enforcement continues under existing provisions of the Environmental Code governing hazardous substances in EEE.

More information can be found here in French.

Italy

Legislative Decree No. 29 regarding batteries and waste batteries (in force)

On 6 March 2026, Italy adopted Legislative Decree No. 29 of 10 February 2026 to align its national legal framework with Regulation (EU) 2023/1542 on batteries and waste batteries. This European Union (EU) regulation establishes harmonized rules across the EU covering the entire lifecycle of batteries, with the aim of improving sustainability, safety, and circularity. The decree ensures that Italian legislation is updated to reflect these requirements and replaces outdated provisions.

The decree updates the structure of national legislation governing batteries and waste management. It introduces provisions that integrate EU requirements into the Italian system and repeals or amends previous legislation, notably Legislative Decree No. 188/2008, which implemented the former Batteries Directive.

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The new framework introduces requirements across the battery lifecycle, including:

- rules on placing on the market of batteries
- obligations related to collection, treatment, and recycling of waste batteries
- market surveillance and compliance mechanisms
- alignment with EU provisions on sustainability, safety, and labeling

The decree also strengthens obligations for economic operators, including manufacturers, importers, and distributors, ensuring consistency with EU supply chain requirements. Companies must ensure compliance with updated provisions relating to waste management, product requirements, and traceability. The decree supports the direct application of the EU Batteries Regulation while ensuring national enforcement and implementation measures are in place. Penalties for non-compliance are expected to follow existing national enforcement frameworks.

More information can be found in Italian in this announcement in the Gazzetta Ufficiale.

United Kingdom

Mandatory classification and labeling of ammonium difluoro-[1,1,2,2-tetrafluoro-2-(pentafluoro-ethoxy)-ethoxy]-acetate (proposal)

The Health and Safety Executive (HSE) has opened a consultation on a proposal to introduce a Great Britain mandatory classification and labeling (GB MCL) for ammonium difluoro-[1,1,2,2-tetrafluoro-2-(pentafluoroethoxy)-ethoxy]-acetate (EC No. not available, CAS No. 908020-52-0 . The proposal has been submitted under Article 37A, which allows the introduction of legally binding hazard classifications for substances placed on the Great Britain market. If the proposed GB MCL is approved, new labeling and packaging requirements might apply.

Through the consultation, HSE is seeking stakeholder feedback and scientific evidence relevant to the proposed classification and labeling of the substance. Following the consultation period, which ends on 1 May 2026, HSE will review the information received before preparing an agency opinion and recommendation on whether the substance should be added to the GB MCL list.

Amendments to Great Britain chemicals regime (draft)

On 26 February 2026, the Department for Work and Pensions laid draft regulations to amend three Great Britain (GB) chemicals regimes for which the Health and Safety Executive (HSE) is responsible. For the aerospace and defense (A&D) industry, the most relevant changes are those affecting GB classification, labeling and packaging (CLP) regulation and the Prior Informed Consent (PIC) regulations, because they may affect hazard classification and labeling processes, export compliance, and supply chain communication for hazardous substances and mixtures used by A&D companies.

Under GB CLP, the draft regulations would revoke the GB notification database provisions and replace the current Articles 37 and 37A with a single new Article 37 for mandatory classification and labeling proposals. The new procedure includes a fast-track route for proposals from certain territories or authorities and it preserves the old procedure for certain proposals already submitted or published before commencement. The mandatory classification and labeling decisions can affect hazard communication, safety data sheet content, and downstream compliance expectations across the supply chain.

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Under GB PIC, the draft regulations would remove additional conditions that currently apply only to certain chemicals so that the same conditions apply more generally to chemicals requiring prior informed consent before import. The draft would also remove the requirement in certain cases for exporters to obtain a special reference identification number and include it in their export declaration. These changes involve cross-border movements of hazardous chemicals and may alter export documentation and consent related compliance procedures.

The draft legislation will be subject to debate in the House of Commons and the House of Lords. More information can be found in this notice from HSE.

Removal of statutory obligations under the Great Britain Classification, Labeling, and Packaging Regulations to automatically consider opinions from the European Union Committee for Risk Assessment (draft)

The Health and Safety Executive (HSE) plans to remove the statutory obligation under Great Britain Classification, Labeling, and Packaging Regulations (GB CLP) to automatically consider opinions from the European Union (EU) Committee for Risk Assessment (RAC) when establishing GB mandatory classifications. A fast-track evaluation route will be introduced, based on EU adoption of United Nations Globally Harmonized System (GHS) classifications. The two current GB CLP procedures (Articles 37 and 37A) will be consolidated into a single process. The GB CLP notification database and associated notification obligations will be revoked.

The HSE has also indicated its intention to align with the EU's new hazard classes (e.g., endocrine disruption and environmental persistence), while noting potential future revisions at the UN level. According to HSE, only 11% of GB mandatory classifications adopted since Brexit differ from EU classifications.

If adopted, these reforms may impact how mandatory classifications are established and updated in Great Britain. More information can be found in this document from HSE.

Addition of fifteen substances of very high concern to the Candidate List (consultation)

The Health and Safety Executive (HSE) has launched its first public consultation to add fifteen chemical substances as substances of very high concern (SVHCs) to the domestic UK REACH Candidate List. These chemicals all hold a mandatory classification under the Great Britain Classification, Labeling, and Packaging (GB CLP) Regulation as carcinogenic, mutagenic, or toxic to reproduction and are part of a government commitment to review 44 substances added to the European Union's list since 2020. These chemical substances are listed below:

Carcinogenic (Article 57a)

- 2,2',6,6'-tetrabromo-4,4'-isopropylidenediphenol (TBBPA; EC No. 201-236-9; CAS No. 79-94-7)
- 2,2-bis(bromomethyl)propane-1,3-diol (BMP); 2,2-dimethylpropan-1-ol, tribromo derivative/3-bromo-2,2-bis(bromomethyl)-1-propanol (TBNPA); 2,3-dibromo-1-propanol (2,3-DBPA; EC and CAS Nos. not available)

Toxic for reproduction (Article 57c)

- 2-(4-tert-butylbenzyl)propionaldehyde and its individual stereoisomers (Lysmeral; EC & CAS No. not available)
- 2-(dimethylamino)-2-[(4-methylphenyl)methyl]-1-[4-(morpholin-4-yl)phenyl]butan-1-one (Omnirad; EC No. 438-340-0; CAS No. 119344-86-4)
- 6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol (DBMC; EC No. 204-327-1; CAS No. 119-47-1)

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- 6-[(C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid (Tetra-PSCA; EC No. 701-118-1; 2156592-54-8)
- barium diboron tetraoxide (EC No. 237-222-4; CAS No. 13701-59-2)
- bis(2-(2-methoxyethoxy)ethyl)ether (Tetraglyme; EC No. 205-594-7; CAS No. 143-24-8)
- bis(α,α-dimethylbenzyl) peroxide (EC No. 201-279-3; CAS No. 80-43-3)
- dioctyltin dilaurate, stannane, dioctyl-, bis(coco acyloxy) derivs., and any other stannane, dioctyl-, bis(fatty acyloxy) derivs. wherein C12 is the predominant carbon number of the fatty acyloxy moiety (DOTL, EC and CAS Nos. not available)
- diphenyl(2,4,6-trimethylbenzoyl)phosphine oxide (EC No. 278-355-8; CAS No. 75980-60-8)
- orthoboric acid, sodium salt (EC and CAS Nos. not available)
- **Substance name: tetra(sodium/potassium) 7-[(E)-{2-acetamido-4-[(E)-(4-{[4-chloro-6-({2-[(4-fluoro-6-{[4-(vinylsulfonyl)phenyl]amino}-1,3,5-triazine-2-yl)amino]propyl}amino)-1,3,5-triazine-2-yl]amino}-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate (Reactive Brown 51; EC No. 466-490-7, CAS No. not available)
- tris(2-methoxyethoxy)vinylsilane (EC No. 213-934; CAS No. 1067-53-4)

Carcinogenic (Article 57a), Mutagenic (Article 57b)

- N-(hydroxymethyl)acrylamide (EC No. 213-103-2; CAS No. 924-42-5)

The consultation opened on 9 March 2026. Stakeholders can submit use, exposure, and alternative data by 20 April 2026, but comments questioning existing hazard classifications will not be considered. If no comments are received on a proposal, the substance will automatically be added to the Candidate List; if comments are submitted, the HSE will issue a final decision within 45 days of the consultation's close.

NORTH AMERICA

Canada

Framework for the risk assessment of manufactured nanomaterials (published)

Health Canada and Environment and Climate Change Canada have published a framework outlining how the risks of nanomaterials to human health and the environment will be assessed in Canada. This follows the publication of a draft version of the framework three years earlier. The framework applies to nanomaterials already on the market and listed on the Domestic Substances List, as well as to new nanoparticles introduced to the market.

The assessment of nanoparticles will follow the same general principles used for bulk substances. However, as nanomaterials have unique characteristics, the framework explains that a weight of evidence approach will be used, combining multiple lines of evidence to determine whether a nanomaterial meets the toxicity criteria under the Canadian Environmental Protection Act.

The framework also sets out specific considerations for identifying and classifying nanomaterials, considering both their similarities to bulk substances and their distinct nanoscale properties. In addition, it explains how risk assessments will draw

on existing datasets and modelling approaches, and how environmental and human health risks will be characterized. These considerations include environmental transport and persistence, disposal of nanomaterials, and potential exposure to consumers through products.

Amendments to Schedule 3 of the Canadian Environmental Protection Act, 1999 (published)

On 25 February 2026, Canada published an order amending Schedule 3 of the Canadian Environmental Protection Act, 1999, which sets out the Export Control List. The objective of the order is to add substances to the Export Control List so that they become subject to the Export of Substances on the Export Control List Regulations, support Canada's continued compliance with the Rotterdam Convention, and align certain existing substance descriptions with the Rotterdam Convention, the Stockholm Convention and related domestic risk management instruments.

The order adds new entries for hexabromocyclododecane (CAS No. 25637-99-4), perfluorooctanoic acid (CAS No. 335-67-1) and related salts and compounds, polybrominated diphenyl ethers, long-chain perfluorocarboxylic acids and related salts and compounds, ferbam (CAS No. 14484-64-1), and Dechlorane Plus (CAS No. 13560-89-9). It also moves phorate (CAS No. 298-02-2) from Part 3 to Part 2 of the Export Control List because it was recently listed in Annex III to the Rotterdam Convention. Additionally, the order repeals Item 18 of Part 3 of the Export Control List.

In addition, the order amends the descriptions of certain substances already listed in Parts 1 and 2 for clarification only, including polybrominated biphenyls, polychlorinated terphenyls, phosphamidon, 2,3,4,5-bis(2-butylene)tetrahydro-2-furaldehyde, dinoseb, dinitro-ortho-cresol (DNOC) and its salts, pentachlorophenol, endosulfan and perfluorooctane sulfonate. The Gazette states that these clarification amendments do not modify the scope of the listings. Most amendments come into force on the same day as the Prohibition of Certain Toxic Substances Regulations, 2025, while the Dechlorane Plus listing comes into force on the fifth anniversary of the publication of those Regulations in the Canada Gazette, Part II.

Penalties are not mentioned in the update.

Four orders amending the Domestic Substances List (in force)

Canada has adopted four Orders amending the Domestic Substances List (DSL) under the Canadian Environmental Protection Act, 1999 (CEPA). The Orders SOR/2026-15, SOR/2026-20, SOR/2026-26 and SOR/2026-27 update the regulatory status of several substances following notification and assessment under Canada's chemicals management framework. The amendments recognize that the substances have been manufactured in or imported into Canada above the thresholds defined under CEPA and therefore qualify to be listed on the DSL, meaning they are considered existing substances under Canadian law.

The DSL functions as Canada's official inventory of chemical substances in commerce and is divided into eight parts based on substance type (such as chemicals, polymers, or living organisms), confidentiality, and the application of Significant New Activity (SNAc) provisions. Substances that do not appear on the DSL are considered "new" to Canada and are subject to strict notification and assessment requirements prior to market entry.

Order 2025-87-20-01 (SOR/2026-15) applies SNAc provisions to cyclohexanamine (CAS No. 108-91-8) by deleting it from Part 1 of the DSL and adding it to Part 2, requiring notification to the Minister at least 90 days before certain new uses in consumer products or cosmetics above specified concentration thresholds or where imports of such products exceed 10 kg per year.

Order 2025-87-25-01 (SOR/2026-20) introduces SNAc provisions for hexanoic acid, 2-ethyl-, 2-ethylhexyl ester (CAS No. 7425-14-1) when used in consumer products subject to the Canada Consumer Product Safety Act at concentrations of 0.1% by weight or greater, with proposed significant new activities requiring notification to the Minister at least 180 days in advance.

Order 2026-87-02-01 (SOR/2026-26) adds five chemicals and polymers to the DSL:

- two substances are added to Part 1 by their CAS Registry Numbers (13325-14-9 and 78197-98-5)
- Three masked polymer substances are added to Part 3, identified by DSL accession Nos. 19810-8, 19811-9, and 19812-0; please refer to the sources for the full names of these masked polymers

Order 2026-112-02-01 (SOR/2026-27) adds two living organisms to the DSL following assessment under the New Substances Notification Regulations (Organisms):

- one recombinant, chimeric vesicular stomatitis virus is added to Part 5
- one Saccharomyces species is added to Part 7 (DSL Accession No. 19809-7)

As a result, companies may manufacture or import the listed substances in Canada without submitting a New Substances Notification prior to market entry, although SNAc provisions require notification before certain new activities involving the specified substances. They remain subject to the broader regulatory framework established under CEPA.

The four orders were registered between 3 and 16 February 2026 and published in the Canada Gazette, Part II on 25 February 2026, entering into force on the date of registration. No penalties are specified in the orders.

Code of Practice for methanone, diphenyl- (benzophenone) in paint, stain, and/or coating products (consultation)

Health Canada has opened a consultation on a proposed Code of Practice for methanone, diphenyl- (benzophenone; CAS No. 119-61-9) in paint, stain, and coating products available to consumers in Canada. The initiative aims to reduce public exposure to benzophenone by recommending that its concentration in certain interior and exterior paints, stains, and coatings be limited to 0.2% w/w (2,000 milligrams per kilogram), thereby helping to protect human health by reducing potential dermal and inhalation exposure during product use. The proposed Code of Practice was published on 14 February 2026, and stakeholders are invited to submit comments until 15 April 2026 as part of the public consultation process.

United States

Statement of findings for Escherichia coli and genetically engineered yeast (published)

The Environmental Protection Agency (EPA) published a notice presenting statements of findings for certain new chemicals and significant new uses reviewed under the Toxic Substances Control Act (TSCA). The notice covers submissions assessed between 1 November 2025 and 31 December 2025.

Under TSCA section 5, companies must notify EPA before manufacturing (including importing) a new chemical substance or before engaging in a use designated as a significant new use. EPA then evaluates whether the substance or use may present an unreasonable risk to human health or the environment. When EPA determines that the substance or use is not likely to present an unreasonable risk, it must publish a statement of findings in the Federal Register.

The notice identifies the TSCA submissions for which EPA made such determinations during the reporting period. The listed submissions include:

- J-25-0011 - Escherichia coli (gene-edited) containing eight integrated genes
- J-25-0015 - Genetically engineered yeast producing a chemical substance

For these cases, EPA concluded that the new chemical substances or significant new uses are not likely to present an unreasonable risk of injury to health or the environment. As a result, the submitters may commence manufacturing or processing for the intended use even if part of the standard review period remains.

There are no penalties associated with this notice.

Extending the reporting deadline under the Greenhouse Gas Reporting Rule for 2025 (effective)

On 27 February 2026, the U.S. Environmental Protection Agency published a rule to extend the deadline for reporting greenhouse gases for the year 2025, outlined in the Mandatory Greenhouse Gas Reporting regulation (40 CFR Part 98), from 31 March 2026 to 30 October 2026. This change is due to comments received on the proposed rescission of the Greenhouse Gas Reporting Program. This rule is effective from 27 February 2026.

There are no penalties associated with this update.

Addition of sodium perfluorohexanesulfonate (PFHxS-Na) to the Toxic Release Inventory (published)

On 23 February 2026, the U.S. Environmental Protection Agency (EPA) finalized a rule adding sodium perfluorohexanesulfonate (PFHxS-Na; CAS No. 82382-12-5) to the Toxics Release Inventory (TRI). The objective of the rule is to expand toxic chemical reporting and strengthen transparency on PFAS pollution by requiring businesses in covered industries to track and report the use and release of PFHxS-Na.

The rule adds PFHxS-Na to the TRI as a chemical of special concern, subject to a lower reporting threshold of 100 lbs. The first reporting period began on 1 January 2026, with the first reports due to EPA by 1 July 2027. This addition brings the total number of PFAS substances tracked by TRI to 206.

Penalties are not mentioned in the update.

Amendments to the Risk Management Program regulations (consultation)

The U.S. Environmental Protection Agency (EPA) has proposed amendments to the Risk Management Program (RMP) regulations implementing Section 112(r) of the Clean Air Act (comments were due on 10 April 2026). The RMP framework applies to facilities that manage extremely hazardous substances above regulatory thresholds and requires them to develop and maintain risk management plans aimed at preventing and mitigating accidental chemical releases. The proposal forms part of EPA's reconsideration of the 2024 Safer Communities by Chemical Accident Prevention rule and seeks to reduce regulatory burden while maintaining core accident-prevention safeguards.

The proposed amendments would revise several RMP provisions affecting covered facilities that manufacture, process, use, or store hazardous substances above threshold quantities. Changes include revisions to safer technology and alternatives

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analysis requirements, third-party compliance audits, employee participation provisions, emergency response coordination with local authorities, and community information access. The proposal would also modify requirements related to natural hazard assessments, power-loss preparedness, documentation of declined safety recommendations, and emergency response exercises, while clarifying regulatory definitions and certain information-collection obligations associated with RMP submissions.

Proposed renewal of the Chemical Data Reporting Information Collection Request under the Toxic Substances Control Act (consultation)

The U.S. Environmental Protection Agency (EPA) has opened a consultation on the proposed renewal of the Chemical Data Reporting (CDR) Information Collection Request under the Toxic Substances Control Act (TSCA). The notice is issued under the Paperwork Reduction Act, which requires public consultation before information collection activities are submitted to the Office of Management and Budget (OMB) for approval.

The notice concerns the renewal of EPA ICR No. 1884.17 (OMB Control No. 2070-0162) covering reporting obligations under the TSCA Chemical Data Reporting rule (40 CFR Part 711). The documentation outlines reporting forms, burden estimates and data collection procedures associated with the program.

Under the CDR rule, manufacturers and importers of certain chemical substances must periodically report information on production volumes, processing activities, and uses of chemical substances in the United States. Reporting occurs on a four-year cycle, with the next reporting period expected in 2028. The proposed action does not introduce new reporting obligations but renews the existing information collection framework used by EPA to support chemical risk assessment and management under TSCA.

EPA is seeking stakeholder input before submitting the renewed Information Collection Request to the Office of Management and Budget (OMB) for approval. Comments must be submitted by 27 April 2026. No penalties are introduced by this notice.

Receipt of new chemical submissions under Section 5 of Toxic Substances Control Act (proposed)

The U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register on 10 March 2026, opening a public consultation regarding the receipt of new chemical submissions under Section 5 of the Toxic Substances Control Act (TSCA). Comments were due on 9 April 2026.

Under TSCA, manufacturers and importers must notify EPA before initiating the commercial manufacture, processing, or significant new use of any chemical substance not currently listed on the TSCA Inventory. This mandatory notification allows EPA to review the submissions and make risk determinations before these new chemicals enter the market. The current notice provides status updates for regulatory filings that passed initial screening and were determined as completed between 29 September 2025 and 31 December 2025. These regulatory filings include Premanufacture Notices, Significant New Use Notices, Microbial Commercial Activity Notices, Notices of Commencement, test information, and exemption applications (such as Test Marketing Exemption and biotechnology exemptions).

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Bill: Toxic Substances Control Act Fee Reauthorization and Improvement Act of 2026 (draft)

The United States Senate has shared a draft bill called the Toxic Substances Control Act[3] Fee Reauthorization and Improvement Act of 2026. Chemical companies have experienced lengthy delays in obtaining approval for new chemicals. This bill tries to fix that problem by speeding up the review process. The Senate is working on this now because the Environmental Protection Agency's (EPA's) authority to collect fees for these reviews will expire on 30 September 2026.

The proposed bill changes how new chemicals are reviewed in several ways.

A Tiered System: The bill requires the EPA to speed up new chemical reviews by dividing them into four "tiers" with strict deadlines, categorizing them by Safer Choice standards (Tier 1), established scientific methods (Tier 2), safer alternatives (Tier 3), and all other chemicals (Tier 4). If a company disagrees with the assigned tier, the company may request an in-person meeting with the EPA to challenge the classification.

Stewardship Pathway: The proposal creates a stewardship pathway allowing conditional approval for a chemical if the manufacturer demonstrates safe management practices. A stewardship implementation plan must describe risk control measures, engineering controls, protective equipment, and disposal procedures. Downstream purchasers must sign contractual agreements confirming compliance with the safety plan. Non-compliance by a purchaser requires the manufacturer to immediately stop distribution to that entity.

Outside Reviewers: The EPA would create a program to let approved outside experts (third-party assessors) review chemical applications to help speed up the process.

Clearer Rules: The bill revises key definitions in TSCA. The definition of "conditions of use" would exclude hypothetical scenarios or intentional misuse. The legislation also provides a clearer definition of "unreasonable risk" used in regulatory decisions.

Exemptions: The bill creates permanent exceptions for chemicals made in small amounts (less than 500 kilograms per year) or that have very low releases and low risks for people.

The draft bill was published on 26 February 2026. Penalties for non-compliance, such as failure to follow an approved stewardship plan, are considered prohibited acts under TSCA and may lead to legal enforcement actions. Consequences may include revocation of stewardship approvals or loss of accreditation for third-party assessors.

California sets August 2026 deadline for first corporate climate reports (adopted)

California's Air Resources Board (CARB) has adopted initial regulations implementing SB 253 (Climate Corporate Data Accountability Act) and SB 261 (Climate-Related Financial Risk Act), which impose mandatory climate disclosures on U.S. companies doing business in California above specified revenue thresholds, regardless of sector.

Under SB 253, companies with annual revenues exceeding $1 billion are required to report Scope 1 and Scope 2 GHG emissions annually, with the first reports (covering 2025 data) due by August 10, 2026; Scope 3 emissions reporting becomes mandatory starting in 2027 (for 2026 data). SB 261 requires biennial reports on climate-related financial risks and mitigation/adaptation measures for companies with revenues over $500 million, though enforcement is currently paused

[3] a.k.a. TSCA

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due to a Ninth Circuit injunction, making initial reporting (originally due January 1, 2026) voluntary pending appeal resolution.

For aerospace and defense entities operating in or doing business with California—particularly those with significant revenues, complex global supply chains, and high emissions profiles from manufacturing, operations, and procurement—this draft/finalized framework demands robust emissions tracking, assurance preparation (limited assurance on Scope 1/2 anticipated in subsequent years), and risk disclosure processes, while smaller or non-California-exposed firms remain unaffected.

While specific penalties are authorized under the statutes (up to $500,000 per year per entity for SB 253 violations such as non-filing, late filing, or misstatements, and up to $50,000 per year for SB 261), the regulation focuses on the adoption and deadlines without detailing enforcement mechanics beyond the ongoing legal challenges to SB 261. The regulations remain subject to potential adjustments amid litigation and rulemaking refinements.

Updates to Connecticut's PFAS in Products compliance information (published)

On 18 February 2026, the Connecticut Department of Energy & Environmental Protection (DEEP) updated its PFAS in Products compliance information under Connecticut General Statutes section 22a 903c, including the approved words that may be used to inform purchasers that PFAS is intentionally added to covered products. From 1 July 2026, covered products containing intentionally added PFAS may be manufactured, sold, offered, or distributed for sale in Connecticut only if they are labeled using DEEP-approved words or symbols, visible before sale, and durable and legible for the product's useful life. In addition to existing approved statements, DEEP allows a list format where the label states "This product contains:" followed by a list of chemicals including "PFAS" or "PFAS chemicals" with separators limited to commas, semicolons, the word "and", or combinations of these, and not using "and/or" or "or". DEEP states that additional words or symbols may be approved upon petition. Separate disclosure requirements apply from 1 January 2026 for turnout gear and outdoor apparel for severe wet conditions.

From 1 July 2026, manufacturers of covered products containing intentionally added PFAS must provide prior notification to DEEP with specified product and PFAS information and must revise the submission when information changes or when requested. DEEP indicates that information on how the notification can be submitted will be posted to the webpage.

On and after 1 January 2028, covered products, including turnout gear and outdoor apparel for severe wet conditions, are prohibited from being manufactured, sold, offered for sale, or distributed for sale in Connecticut if they contain intentionally added PFAS. DEEP may request a certificate of compliance and supporting information, and the update lists exemptions.

Penalties are not mentioned in the update.

New Mexico requests state regulators to review the implementation of the Per- and Polyfluoroalkyl Substances Protection Act (adopted)

In February 2026, the New Mexico Legislature adopted House Joint Memorial 3 (HJM 003) requesting state regulators to review the implementation of the Per- and Polyfluoroalkyl Substances Protection Act (HB 212) and assess whether certain exemptions in the law should remain in place. The request focuses on exemptions for fluoropolymers and certain complex, manufactured products. The PFAS Protection Act, signed into law in 2025, introduced a broad phase-out and prohibition of

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products containing intentionally added PFAS, reflecting growing concern about the environmental persistence and health risks associated with these substances.

This legislative measure establishes reporting requirements for state regulators:

- the New Mexico Environment Department (NMED) must formally assess the risks of the current PFAS exemptions, which apply to fluoropolymers – NMED is additionally tasked with recommending to the legislature whether these specific exemptions should be continued, modified, or removed
- the Environmental Improvement Board (EIB) must report on the implementation of the Act, including the efficacy of the rules already promulgated under the PFAS Protection Act

For manufacturers this update serves as an early warning that currently exempted PFAS uses may face future restrictions depending on the outcome of the department of environment's recommendations.

The joint memorial passed senate on 18 February 2026. The NMED is required to present its preliminary findings to appropriate interim legislative committees by 1 December 2026 and must submit its final report to the governor and legislature by 1 August 2027. There are no penalties associated with this update.

New York Senate Bill S9073A amending the environmental conservation law to ban certain products containing per- and polyfluoroalkyl substances (proposed)

On 28 January 2026, a bill was introduced in New York proposing a ban on certain products containing per- and polyfluoroalkyl substances (PFAS). On 10 February 2026, the bill was passed by the Senate and is awaiting approval and signature before it can take effect.

If enacted, the bill would prohibit the sale of products containing "regulated" PFAS across the following sectors from 1 January 2028:

- architectural paints
- cleaning products
- fabric treatments
- rugs
- ski waxes
- textile articles

Manufacturers of these products are to provide retailers with a certificate of compliance signed by authorized officials that the product does not contain regulated PFAS. If a product is suspected to be in violation of this bill and contains regulated PFAS, the manufacturer has 30 days to provide laboratory tests indicating that the product does not contain regulated PFAS or notify retailers of the product that the product is prohibited from being sold in the state and provide names and addresses of those notified. Retailers who are not also manufacturers of these products will not be held responsible for violation of this bill if they can show that they sold the product in good faith according to the certificate of compliance they were provided.

Violation of this bill would result in a civil penalty of up to $1,000 for each day. A second violation would result in a civil penalty of up to $2500.

OCEANIA

Australia

Updates to the Industrial Chemicals Categorization Guidelines (published)

The Australian Industrial Chemicals Introduction Scheme (AICIS) has finalized updates to the Industrial Chemicals Categorization Guidelines, which will take effect in September 2026. The guidelines help introducers categorize industrial chemicals not listed on the Australian Inventory of Industrial Chemicals (AIIC) and provide methods for calculating Environment Categorization Volumes (ECV) and Human Health Categorization Volumes (HHCV) used in risk assessments. The update incorporates new hazard information and AICIS evaluations to ensure high-hazard substances are identified and regulated before being introduced to the Australian market.

High-Hazard List
Appendix 8.1 of the guideline lists chemicals identified as having high hazards for categorization. The update introduces:

- 293 new high-hazard entries
- 122 updates to existing entries within the categorization framework
- correction of the CAS number for bis(pentachlorophenyl) carbonate to 7497-08-7
- removal of chemicals: 1,1,1-trichloroethane (CAS No. 71-55-6) and fluoro(triphenyl)stannane (CAS No. 379-52-5)

Developmental Toxicity
Part 6.5.2 sets out the information required to demonstrate the absence of developmental toxicity for certain substances. The following chemicals have been included:

- 1H-benzotriazole (CAS No. 95-14-7)
- 1H-benzotriazole, 6-methyl- (CAS No. 136-85-6)
- 1H-benzotriazole, 6-chloro- (CAS No. 94-97-3)
- 1H-benzotriazole, 7-methyl- (CAS No. 29878-31-7)
- 1H-benzotriazole, 6(or 7)-methyl (CAS No. 29385-43-1)

Introducers must confirm that their substances are not salts of the specified 1H-benzotriazole chemicals. A previous proposal to include esters was corrected as an error. Salts may qualify for exemption if they meet defined criteria, such as being high-molecular-weight polymers (≥1,000 grams per mole) with low levels of low-molecular-weight species.

New Definition
Part 2.2.1 has been revised to introduce a single definition of “chemical identity holder.” The new definition clarifies that the person who knows the chemical identity is responsible for providing this information under the reporting provisions of the Industrial Chemicals (General) Rules 2019.

The revisions were finalized following a public consultation from 13 November 2025 to 28 January 2026, and the updated guidelines will apply from September 2026. There are no penalties associated with this update.

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Two substances added to the Australian Inventory of Industrial Chemicals (published)

The Australian Industrial Chemicals Introduction Scheme (AICIS) added decanoic acid, mixed diesters with octanoic acid and 1,3-propanediol (CAS No. 1072005-10-7) to the Australian Inventory of Industrial Chemicals (AIIC) in accordance with section 82 of the Industrial Chemicals Act 2019 because five years have passed since its assessment certificate was issued. Manufacturers and importers are subject to specific information requirements following the chemical's listing. They are obligated to notify the relevant authority if the circumstances of their importation or manufacture differ from those evaluated in the original assessment. The chemical was officially listed on 23 February 2026, and the notice was published on 25 February 2026. Affected manufacturers and importers must submit the required information regarding any changes to their introduction circumstances within 28 days. There are no penalties associated with this update.

AICIS also added 1-pyrrolidinepropanaminium, N,N,N-trimethyl-2,5-dioxo-, 3-polyisobutenyl derivs., Me sulfates (CAS No. 3113590-25-0) to AIIC. Although the chemical is now listed on the AIIC, introducers must continue to comply with any conditions specified in the original assessment. The update does not introduce new regulatory requirements but formalizes the chemical's transition from certificate-based introduction to full Inventory listing.

Variation to the Australian Inventory of Industrial Chemicals regarding the substance decanedioic acid, reaction products with 1-octadecanamine, calcium salts (published)

The Australian Industrial Chemicals Introduction Scheme (AICIS) has varied the terms of an Inventory listing on the Australian Inventory of Industrial Chemicals (AIIC) following the revocation of a previously granted Confidential Business Information (CBI) approval. The variation concerns the chemical decanedioic acid, reaction products with 1-octadecanamine, calcium salts (CAS No. 403656-24-6).

The revocation of CBI approval means that the proper chemical name is now publicly disclosed on the AIIC. As a result, the Inventory entry has been updated to reflect the full chemical identity and associated regulatory conditions. Under Australia's industrial chemicals framework, when CBI status is revoked and the true identity of a chemical is published, introducers (importers or manufacturers) must ensure their introduction complies with the assessed conditions of listing. Where the circumstances of introduction differ from those previously assessed, introducers are required to notify AICIS within 28 days.

The variation does not introduce a new chemical to the Inventory but updates the listing transparency and regulatory obligations following removal of confidentiality protections.

Asbestos Framework Review (consultation)

Safe Work Australia has launched a public consultation as part of its Asbestos Framework Review to gather feedback on strengthening the nation's model Work Health and Safety asbestos framework, along with its related codes of practice and guidance materials. Participants are asked to respond to a discussion paper containing 43 questions with the central focus on evaluating potential reductions to Australia's workplace exposure standards for airborne asbestos fibers.

Submissions must be made using the online form available on the Consultation Hub before the deadline at 11:59 pm (AEST) on Sunday, 26 April 2026. The collected feedback will inform recommendations scheduled to be considered by Safe Work Australia Members in late 2026.

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SOUTH AMERICA

Brazil

Restrictions on the use of certain hazardous substances in electronic and electrical equipment manufactured, distributed, and sold within the national territory (draft)

At the 149th Ordinary Meeting on 11 March 2026, Brazil's National Environment Council (CONAMA) continued consideration of the draft Brazilian Restrictions of Hazardous Substances (RoHS) regulation, a proposal to restrict hazardous substances in electrical and electronic equipment sold in Brazil under a regulatory framework similar to the European Union RoHS. Documents related to the draft resolution, including a "clean" and "dirty" version of the proposed text, were submitted for deliberation in this meeting.
Thank you for accommodating my request.

The draft resolution (can also be found here in Portuguese) aims to limit the use of certain hazardous substances in electronic products and follows a public consultation that ran from 11 August to 24 September 2025, during which stakeholders provided input. Electronic products, including wires, cables, and spare parts for repair, reuse, upgrades, or performance improvements, can only be manufactured, imported, distributed, and marketed if they contain the following substances in amounts not exceeding the stated limits:

- polybrominated biphenyls (CAS No. 59536-65-1) – 0.1%.
- polybrominated diphenyl ethers (CAS No. 32534-81-9) – 0.1%.
- mercury (CAS No. 7439-97-6) – 0.1%
- cadmium (CAS No. 7440-43-9) – 0.01%.
- hexavalent chromium (CAS No. 18540-29-9) – 0.1%.
- lead (CAS No. 7439-92-1) – 0.1%.
- di(2-ethylhexyl) phthalate (CAS No. 117-81-7) - 0.1%
- benzyl butyl phthalate (CAS No. 85-68-7) - 0.1%
- dibutyl phthalate (CAS No. 84-74-2) - 0.1%
- diisobutyl phthalate (CAS No. 84-69-5) - 0.1%

Manufacturers and importers must comply with these limit values in their products from date of publication for products containing lead and polybrominated diphenyl ethers, 180 days from publication for products containing mercury, three years from publication for products containing cadmium, hexavalent chromium and lead, and four years from publication for products containing di(2-ethylhexyl) phthalate, benzyl butyl phthalate, dibutyl phthalate, and diisobutyl phthalate. Products placed on the market before publication are exempt. Temporary exceptions may be granted in cases where it is technically or scientifically impossible to eliminate or replace the covered substances in the product, or alternative substances have not been reliably guaranteed to work in the product.

The draft resolution also creates the National Registry of Electrical and Electronic Equipment with Restrictions on Hazardous Substances as a system for the collection and organization of data on electrical and electronic equipment subject to these restrictions. Manufacturers and importers must declare that they comply with the restrictions or exceptions in this resolution, and registration is mandatory and must take place before manufacture or importation of products. Manufacturers are responsible for ensuring that information in registrations is kept up to date. Declaration of products must include the manufacturer's identification data, the identification data of the foreign manufacturer and the importer

and an indication of compliance with the restrictions. This declaration must accompany the product's packaging. Electrical and electronic equipment must contain information allowing identification and traceability of the product. The relevant environmental authority may request sample batches of products to conduct inspections to ensure compliance, and have the power to science batches if necessary, and request further information from manufacturers and importers.

This resolution would enter into force from the date of its publication. There are no penalties associated with this update

Chile

Decree establishing waste management and extended producer responsibilities and promoting recycling for batteries (draft)

On 16 February 2026, Chile's Ministry of the Environment (MoE) published a draft decree (can also be found here in Spanish) that would place batteries under the framework of Law No. 20,920, which establishes a framework for waste management, extended producer responsibility (EPR), and the promotion of recycling. The measure aims to support an environment free from pollution and protect human health by improving the management of battery waste. The draft decree sets out obligations for battery producers and management systems, as well as targets for the collection and recovery of battery waste.

The decree applies to batteries placed on the market, whether sold individually or as part of a vehicle, appliance, or machinery of any kind. Producers placing batteries on the market are subject to EPR and must register through the RETC[4] Single Window in accordance with Supreme Decree No. 1 of 2023. They are responsible for organizing and financing the nationwide collection of battery waste, as well as its storage, transport, and treatment, and must meet the collection and recovery targets established by the decree. Producers must also ensure that battery waste management activities are conducted by authorized personnel. Producers introducing batteries to the market for the first time must comply with the RETC registration requirement within four months of first placement on the market. Micro-enterprises and producers placing less than 600 kg of batteries on the market per year are exempt from EPR obligations but must submit the information required under Article 11 of Law No. 20,920 annually through the RETC Single Window.

The decree states that management systems may operate either individually, covering waste generated by a single producer, or collectively, covering waste within the relevant category. Management systems may only be composed of producers.

All management systems must obtain authorization from the MoE by submitting a management plan on 30 June of the year prior to that which the plan is set for. The plan must include information on participating producers, estimates of the quantity of batteries they place on the market, a strategy for meeting the decree's targets and obligations, projected waste management costs, financing mechanisms for the duration of the plan, and procedures for verifying compliance. Collective management systems must also provide additional information, including financial guarantees (e.g., bonds or insurance) and rules governing the admission of new members or operators. Changes to management plans must be reported to the MoE through the RETC Single Window.

Management systems have several obligations under the decree, including entering into agreements with authorized waste managers, ensuring the regular collection of battery waste from retailers to prevent storage beyond limits set by health regulations, and operating collection points where consumers can return battery waste free of charge. They must also

[4] RETC = Registro de Emisiones y Transferencias de Contaminantes

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submit a progress report to the MoE by 30 September and a final certified report by 31 May each year and implement communication and awareness strategies to promote proper battery handling and waste prevention to consumers.

The decree also establishes progressive collection and recovery targets for battery waste, specifically lead-acid and lithium-ion batteries, based on the quantity of batteries placed on the market. For lead-acid batteries, targets for how much waste must be collected and recovered compared to what producers sell increase from 50% in the first year to 90% by the ninth year. For lithium-ion batteries, targets begin in the third year at 15% and rise gradually to 50% from the tenth year onward. At least 30% of the lithium-ion recovery target must be met through preparation for reuse, and only waste from the relevant battery category may count toward compliance.

This draft decree has a consultation period of 30 days from its publication, ending on 18 March 2026. The draft decree was notified to the World Trade Organization on 27 February 2026, which opened a 60-day consultation period for international countries, ending on 28 April 2026. No penalties are associated with this update.

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