

Newsletter

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

IAEG

Vol.6, Issue 9
26 October 2026

NEWSLETTER

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

Volume 6 Issue 9 – 26 October 2026

WHO IS IAEG?

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

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

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

IAEG WORK GROUP 9 NEWSLETTER

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

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

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

SUBSCRIPTION SERVICE

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

IAEG Work Group 9 provides this newsletter with support from yordas Group and HALEY ALDRICH

 © 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Volume 6 Issue 9 – 26 October 2026

IAEG INTERNATIONAL AEROSPACE ENVIRONMENTAL GROUP

TABLE OF CONTENTS

Chemical Management 5

Australia 5

2026 Industrial Chemicals Categorization Guidelines and list of chemicals with high hazards for categorization (published) 5

Canada 6

Orders amending the Non-domestic Substances List and the Domestic Substances List (in force) 6

Notices covering commercial activities to support further prioritization, risk assessment, and risk management (published) 6

European Union 7

Corrigendum to Commission Regulation (EU) 2025/1988 regarding per- and polyfluoroalkyl substances in firefighting foams (published) 7

Commission Delegated Regulation (EU) 2026/1423 regarding chlorpyrifos (adopted) 7

Classification, labeling, and packaging designation for five substances (consultation) 8

Amendment to classification, labeling, and packaging regulations to adapt to the United Nations Globally Harmonized System (consultation) 9

Japan 10

Chemical substances listed under the Chemical Substances Control Law and are now subject to reporting (published) 10

Amendment to the Ordinance on Industrial Safety and Health regarding chemical notification requirements (consultation) 11

Taiwan 11

Amendments to certain provisions of the Regulations for the Labeling and Hazard Communication of Hazardous Chemicals (in force) 11

Requirements to submit hazard and exposure data for seven existing chemical substances (draft) 12

United Kingdom 12

Changes to the GB Prior Informed Consent list (updated) 12

Extension for submitting transitional registration information under UK REACH (in force) 13

 RETURN TO TABLE OF CONTENTS

The Batteries (Placing on the Market) (Northern Ireland) Regulations 2026 (draft) 13
Proposed Great Britain (GB) mandatory classification and labeling of twenty hazardous chemical substances (consultation) 13

United States 14

Significant new use rules for thirty-five chemical substances and multi-walled carbon nanotubes (published) 14
New Mexico per and polyfluoroalkyl substances implementing rule and reporting and labeling guidance (in force) 15
Draft TSCA Risk Evaluations for trans-1,2-Dichloroethylene, 1,2-Dichloropropane, and ethylene dibromide (draft) 16

Vietnam 17

Amendments to three decrees implementing the Law on Chemicals (draft) 17

Circular Economy 18

European Union 18

European Union rules for recycled plastic content in packaging (consultation) 18

Environment 18

Australia 18

Improving the efficiency of climate-related financial disclosures (consultation) 18

China 19

Notice on Issuing the "National 15th Five-Year Plan for Addressing Climate Change" (published) 19
2027 Quotas for ozone depleting substances and hydrofluorocarbons (consultation) 19

European Union 21

List of non-OECD countries authorized to import certain non-hazardous waste from the European Union under Regulation (EU) 2024/1157 (draft) 21

United States 21

Guidance on the California corporate greenhouse gas reporting (published) 21

 © 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

Social/Governance Regulations 22

European Union 22

Amendment to Delegated Regulation (EU) 2023/2772 to simplify certain sustainability reporting standards (published) 22

Supplement to Directive 2013/34/EU to establish sustainability reporting standards for voluntary use by undertakings protected by the value chain cap (published) 22

XBRL Taxonomy for the revised European Sustainability Reporting Standards (draft) 23

European Sustainability Reporting Standards for certain Non-European Union undertakings (draft) 23

United Kingdom 24

Amendments to Section 54 of the Modern Slavery Act 2015 (draft) 24

 © 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

Chemical Management

Australia

2026 Industrial Chemicals Categorization Guidelines and list of chemicals with high hazards for categorization (published)

The Australian Industrial Chemicals Introduction Scheme (AICIS) updated the online Guide to Categorizing your Chemical Importation and Manufacture on 1 September 2026, with the changes taking effect on 1 September 2026. The updates follow a public consultation held from 13 November 2025 to 28 January 2026. AICIS announced the finalized changes on 4 March 2026 and confirmed on 14 August 2026 that the Guidelines would be issued and take effect on 1 September 2026. The Consolidated List was updated to incorporate 293 new entries and updates to 122 existing entries. The update establishes specific developmental toxicity information requirements (adding five benzotriazole derivatives to Part 6.5.2) and streamlines administrative terms by replacing two former definitions of "chemical identity holder" with a single revised definition.

The regulation applies to:

- importers and domestic manufacturers ("introducers") of industrial chemicals, chemical mixtures, and polymers in Australia
- introducers categorizing chemical introductions into exempted, reported, or assessed categories
- for salts of the five benzotriazole derivatives, exception criteria apply where the salt is a high-molecular-weight polymer with low levels of low-molecular-weight species, or has a molecular weight ≥ 1,000 grams per mole (g/mol)

Relevant exclusions and exception criteria include:

- radioactive chemicals as defined under the Industrial Chemicals (General) Rules 2019
- non-industrial chemicals or entries unambiguously outside the industrial chemical definition
- specific high-molecular-weight polymers (or salts/esters with molecular weight ≥ 1,000 g/mol, or ≤ 5% concentration for specific esters) meeting defined exception criteria

AICIS updated the Consolidated List of High Hazard Chemicals, incorporating 293 new entries from trusted external sources and recent evaluations, updating 122 existing entries, correcting the CAS number for bis(pentachlorophenyl) carbonate (CAS No. 7497-08-7), and removing 1,1,1-trichloroethane (CAS No. 71-55-6) and fluoro(triphenyl)stannane (CAS No. 379-52-5).

AICIS added five benzotriazole derivatives to Part 6.5.2 (information required to demonstrate the absence of developmental toxicity) and Step 4.4 Hazard Band C:

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

Introducers may need to verify that an introduction is not an unexempted salt derived from these substances to demonstrate the absence of developmental toxicity. Exception criteria apply if the salt is a high-molecular-weight polymer with low levels of low-molecular-weight species, or has a molecular weight ≥ 1,000 g/mol.

Introducers must categorize their industrial chemical introductions under the applicable AICIS introduction category. The updated online guide and decision tools can be used to work out whether an introduction is listed, exempted, reported, assessed or a commercial evaluation introduction.

There are no penalties specified in this update.

Canada

Orders amending the Non-domestic Substances List and the Domestic Substances List (in force)

On 1 August 2026, Canada published Order 2026-66-09-02 amending Part I of the Non-domestic Substances List (NDSL) under the Canadian Environmental Protection Act, 1999. The Order deletes CAS Nos. 1245903-66-5[1] and 1703784-30-6[2] and adds 1703784-30-8. The Order took effect on publication. There are no new penalties specified in this update.

Substances on the NDSL are considered new to Canada and are subject to the New Substances Notification Regulations (Chemicals and Polymers). Where notification is required, fewer information requirements apply than for substances absent from the NDSL.

On 22 August 2026, Environment and Climate Change Canada published Order 2026-87-10-02, which removes ethanol, 2-amino-, reaction products with ammonia, by-products (CAS No. 68910-05-4) from Part I of the NDSL. The substance was added to Division 1 of Part 2 of the Domestic Substances List (DSL) under the related Order 2026-87-10-01. Consequently, it is no longer subject to the general new-substance notification requirements under the Canadian Environmental Protection Act, 1999 and the New Substances Notification Regulations (Chemicals and Polymers). Both amendments came into force on 10 August 2026.

Existing Significant New Activity (SNAc) requirements have been maintained because of potential human health concerns associated with repeated or prolonged dermal exposure from certain consumer applications. The prescribed information must be submitted to the Minister at least 90 days before using the substance to manufacture a consumer product, other than an epoxy product, containing the substance at a concentration of at least 1% by weight, or importing it in such a product at that concentration where total imports exceed 10 kilograms in a calendar year. Research and development substances, site-limited intermediates and substances or products intended only for export are excluded.

Notices covering commercial activities to support further prioritization, risk assessment, and risk management (published)

On 29 August 2026, the Canadian Department of the Environment published two mandatory information-gathering notices under section 71 of the Canadian Environmental Protection Act, 1999 (CEPA). The notices cover commercial activities undertaken during the 2025 calendar year and will support further prioritization, risk assessment, and risk management activities. Phase 1 covers 184 substances, while Phase 2 covers sixteen substances. Depending on the relevant part of Schedule 1, reporting may be triggered where a person:

- manufactured, imported, or used more than 100 kilograms (kg) of a Part 1 or Part 4 substance

[1] Masked name or confidential substance tracked under the NDSL.
[2] The chemical substance associated with CAS No. 1703784-30-6 was previously listed on Canada's NDSL but was subsequently updated and corrected to CAS No. 1703784-30-8, associated with 2-propenenitrile, reaction products with diethylenetriamine, hydrogenated.

 © 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

- manufactured, imported, or used more than 1,000 kg of a Part 2 substance
- imported or used more than 100 kg of a Part 3 substance for a specified application or use
- imported listed substances at concentrations of at least 0.1% by weight in mixtures, products or specified manufactured items
- used more than 100 kg of a Part 4 substance in activities other than manufacturing a mixture, product or manufactured item

Required information may include quantities manufactured, imported, used, and exported; substance function and application codes; concentrations and quantities in goods sold; commercial, consumer, and children's uses; applicable facility information; and titles of unpublished studies. A person owning multiple facilities must submit one consolidated response covering all facilities. Confidentiality requests must include written reasons.

Phase 1 submissions must be made through Environment and Climate Change Canada's Single Window between 29 August 2026 and 3 March 2027. Phase 2 submissions must be made between 4 March 2027 and 8 September 2027. Extension requests must be submitted before the applicable deadline. Failure to comply or the provision of false or misleading information constitutes an offence under CEPA. Maximum fines for a first offence range from $25,000 for an individual convicted following summary proceedings to $500,000 for a large corporation convicted on indictment, with maximum fines doubled for subsequent offences.

European Union

Corrigendum to Commission Regulation (EU) 2025/1988 regarding per- and polyfluoroalkyl substances in firefighting foams (published)

On 8 September 2026, the European Union published Corrigendum 2026/90757 to Commission Regulation (EU) 2025/1988, which introduced the REACH Annex XVII restriction on per- and polyfluoroalkyl substances (PFAS) in firefighting foams. The corrigendum changes the formula for PFOS-related compounds from $C_8F_{17}SO_3X$ to $C_8F_{17}SO_2X$ and corrects erroneous spacing in the formula for C9–C14 PFCAs. These corrections are in paragraphs 2(a) and 2(b) of Entry 82, which identify substances already controlled under other EU provisions. Those substances remain included when calculating the sum of all PFAS under paragraph 3. The corrigendum introduces no new concentration limits or compliance dates.

Commission Delegated Regulation (EU) 2026/1423 regarding chlorpyrifos (adopted)

On 30 June 2026, the European Commission adopted Delegated Regulation (EU) 2026/1423, which amends Regulation (EU) 2019/1021 by adding chlorpyrifos (EC No. 220-864-4; CAS No. 2921-88-2) to Part A of Annex I. This implements the 12th Stockholm Convention decision (Annex A listing) and formalizes the restriction for chlorpyrifos, which was already prohibited in the European Union (EU) as an active substance in plant protection and biocidal products.

The regulation applies directly across all EU Member States to i) manufacturers, importers, distributors, and chemical formulators of chemical substances, mixtures, and articles, ii) agricultural sector and plant protection product suppliers, and iii) commercial and industrial biocidal product suppliers.

Chlorpyrifos is prohibited from being manufactured, placed on the market, or used, whether on its own, in mixtures, or in articles. Under Article 4(1)(b), chlorpyrifos is allowed only as an unintentional trace contaminant at or below 0.01 milligram per kilogram (mg/kg; 0.000001% by weight). Concentrations above 0.01 mg/kg in any substance, mixture, or article

constitute non-compliance. Quantities of chlorpyrifos used for laboratory-scale research or as a reference standard are still permitted.

The act was published on 10 September 2026 and entered into force on 30 September 2026. Penalties for non-compliance are established by individual EU Member States under Article 14 of Regulation (EU) 2019/1021.

Classification, labeling, and packaging designation for five substances (consultation)

N,N'-(methylenedi-p-phenylene)bis(aziridine-1-carboxamide)
On 24 August 2026, the European Chemicals Agency (ECHA) opened a consultation on Ireland's proposal to add N,N'-(methylenedi-p-phenylene)bis(aziridine-1-carboxamide), also named N,N'-[methylenedi(4,1-phenylene)]di(aziridine-1-carboxamide) (Poly-U; EC No. 231-034-6; CAS 7417-99-4), to Annex VI of the Classification, Labeling, and Packaging (CLP) Regulation (comments due on 23 October 2026). Seven hazard classes are open for comment, with these outcomes proposed by Ireland:

- acute toxicity, dermal: no classification proposed
- acute toxicity, oral: Category 4, H302; ATE 500 milligram/kilogram (mg/kg) body weight
- germ cell mutagenicity: Category 2, H341
- carcinogenicity: Category 1B, H350
- reproductive toxicity: Category 1B, H360D
- specific target organ toxicity, repeated exposure: Category 1, H372, affecting the haematopoietic system

These classifications are proposals, not a new binding Annex VI entry. ECHA's Risk Assessment Committee must assess the proposal before the European Commission decides whether to adopt it.

Dioctyltin oxide
On 7 September 2026, ECHA opened a consultation on Austria's proposal to add dioctyltin oxide (EC No. 212-791-1; CAS No. 870-08-6) to Annex VI of the CLP Regulation. It has no current harmonized entry. Four hazard classes are open for comment, with the following classifications proposed:

- reproductive toxicity: Repr. 1B (H360D)
- specific target organ toxicity following repeated exposure: STOT RE 1 (H372, immune system). Austria proposes a specific concentration limit of 5.0% or above for STOT RE 1, and 0.5% to below 5.0% for STOT RE 2 (H373)
- hazardous to the aquatic environment: Aquatic Chronic 1 (H410), with an M-factor of 100
- PBT/vPvB: classification as PBT with EUH440

Comments are due by 6 November 2026. This is a proposal, so it does not yet create a new harmonized classification. If adopted later, it could affect the classification of mixtures containing dioctyltin oxide and related labels and safety data sheets.

Triglycidyl-m-aminophenol and triglycidyl-p-aminophenol
On 17 August 2026, the European Chemicals Agency opened parallel 60-day consultations on Denmark's proposals for the harmonized classification and labeling of the following two related substances under the CLP Regulation:

- m-(2,3-epoxypropoxy)-N,N-bis(2,3-epoxypropyl)aniline, also known as triglycidyl-m-aminophenol (EC No. 275-662-9; CAS No. 71604-74-5)
- p-(2,3-epoxypropoxy)-N,N-bis(2,3-epoxypropyl)aniline, also known as triglycidyl-p-aminophenol (EC No. 225-716-2; CAS No. 5026-74-4)

 © 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

Both substances are trifunctional epoxy resins used in epoxy and composite materials. They are registered under REACH and currently have no harmonized classification in Annex VI to the CLP Regulation. Denmark proposes the same classifications for both substances:

- skin Sens. 1A, H317: May cause an allergic skin reaction
- muta. 2, H341: Suspected of causing genetic defects

Interested parties may submit scientific comments, supporting hazard data or justifications concerning skin sensitization and germ cell mutagenicity. Following the consultations, ECHA's Committee for Risk Assessment will evaluate each proposal and may recommend a different classification or a specific concentration limit when supported by the available evidence.

The consultations do not introduce immediate legal obligations. If the proposed classifications are subsequently adopted by the European Commission, they would become mandatory and could require updates to the classifications, labels and safety data sheets of the substances and mixtures containing them.

4-dimethylaminoazobenzene
On 17 August 2026, ECHA opened a 60-day consultation on Germany's proposal for a new harmonized classification and labeling entry for 4-dimethylaminoazobenzene (CAS No. 60-11-7; EC No. 200-455-7) under the CLP Regulation. The proposed classifications are germ cell mutagenicity Category 2, H341, and carcinogenicity Category 1B, H350. The substance currently has no harmonized classification in Annex VI to the CLP Regulation.

Stakeholders may comment on the proposed classifications, the information considered in the CLH dossier and the justification for Germany's conclusions. Supporting information may also be submitted. Comments received after 16 October 2026 at 23:59 Helsinki time will not be included in the formal response-to-comments process.

The consultation does not impose immediate compliance obligations. If the proposed classification is subsequently adopted, companies supplying the substance or mixtures containing it may need to review their classifications, labels, packaging, safety data sheets, and workplace risk-management measures.

Amendment to classification, labeling, and packaging regulations to adapt to the United Nations Globally Harmonized System (consultation)

On 17 August 2026, the European Commission published a draft delegated regulation to adapt the European Union (EU) Classification, Labeling and Packaging (CLP) Regulation to technical and scientific progress (comments due on 16 October 2026). The draft would align the CLP Regulation with the eighth, ninth, and tenth revised editions of the United Nations Globally Harmonized System of Classification and Labeling of Chemicals and partially implement the eleventh revised edition.

The proposed changes include validated in vitro and ex vivo methods for classifying skin corrosion, skin irritation, and serious eye damage, as well as revised classification criteria for aerosols, chemicals under pressure and skin-sensitizing mixtures. The draft would also replace precautionary statements P201 and P202 with P203, update label elements for aerosols and chemicals under pressure, and require all applicable medical-response precautionary statements where different exposure routes require different responses.

Mandatory compliance would generally begin 24 months after the regulation enters into force, while substances and mixtures already placed on the market before that date would benefit from a 48-month transitional period.

Japan

Chemical substances listed under the Chemical Substances Control Law and are now subject to reporting (published)

On 31 July 2026, Japan's Ministry of Health, Labor and Welfare, Ministry of Economy, Trade and Industry and Ministry of the Environment jointly published (can also be found here in Japanese) the names and reference numbers of thirty-eight new chemical substances, listed under serial numbers 1823–1860. The authorities determined that the substances fall within one of the assessment outcomes under Article 4, Paragraph 1, items 2–5 of the Chemical Substances Control Law (CSCL).

Following publication, the substances cease to be treated as new chemical substances and enter the general chemical substance framework. Manufacturers and importers may consequently be required under Article 8 to report annual manufacture or import quantities and other prescribed information, subject to the applicable thresholds and exemptions. Manufacturers and importers must also report qualifying hazard information obtained from prescribed tests in accordance with Article 41.

The following five substances (the announcement does not provide CAS numbers for these substances) were determined to meet one or more of the criteria in Article 2, Paragraph 8 and, upon publication of their names, became specified general chemical substances:

- Serial No. 1835, Reference No. (7)-4076: Polycondensation products of 2-(chloromethyl)oxirane / 4,4'-(hexafluoropropane-2,2-diyl)diphenol
- Serial No. 1836, Reference No. (7)-4077: Alpha-{3-[N,N-dimethyl-6-(N-methylmethanaminiumyl)hexan-1-aminiumyl]-2-hydroxypropyl}-omega-[2-(2,3-dihydroxypropoxy)ethoxy]poly[oxyethane-1,2-diyloxy(2-hydroxypropane-1,3-diyl)(dimethylazaniumdiyl)hexane-1,6-diyl(dimethylazaniumdiyl)(2-hydroxypropane-1,3-diyl) sulfate] sulfate, limited to substances containing no more than 10% of components with a molecular weight below 1,000
- Serial No. 1846, Reference No. (7)-4081: Alpha-{3-[N,N-dimethyl-3-(N-methylmethanaminiumyl)propan-1-aminiumyl]-2-hydroxypropyl}-omega-[2-(2,3-dihydroxypropoxy)ethoxy]poly[oxyethane-1,2-diyloxy(2-hydroxypropane-1,3-diyl)(dimethylazaniumdiyl)propane-1,3-diyl(dimethylazaniumdiyl)(2-hydroxypropane-1,3-diyl) sulfate] sulfate, limited to substances containing no more than 10% of components with a molecular weight below 1,000
- Serial No. 1850, Reference No. (7)-4082: Polyaddition products of [polycondensation products of (polycondensation products of ammonia / 1,2-dichloroethane) / tall oil fatty acid / tall oil rosin / 1,1'-(phenylene)dimethanamine / trimer acid obtained as a trimer of unsaturated fatty acid (C18) / dimer acid obtained as a dimer of unsaturated fatty acid (C18)] / [polycondensation products of (chloromethyl)oxirane / 4,4'-(propane-2,2-diyl)diphenol]
- Serial No. 1858, Reference No. (1)-1273: Disilver(I) tetraoxidomolybdate

Under Article 8-2, businesses that manufacture, use or otherwise handle any of the five specified general chemical substances and transfer or supply them to another business must endeavor to communicate the substance's name and its status as a specified general chemical substance. The competent authorities may also provide guidance and advice on handling under Article 39 and request information on handling activities under Article 42. The announcement does not establish a separate compliance deadline, as these obligations arise under the existing CSCL framework.

 © 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

Amendment to the Ordinance on Industrial Safety and Health regarding chemical notification requirements (consultation)

The Ministry of Health, Labor, and Welfare (MHLW) proposes to amend Article 34-2-4 of the Ordinance on Industrial Safety and Health No. 32 of 1972 to expand the information that must be notified when supplying applicable chemicals under Article 57-2(1) of the Industrial Safety and Health Act (ISHA Act No. 57 of 1972) [Sections 1-3]. The proposal (can also be found here in Japanese) affects businesses transferring or supplying chemicals subject to the hazard-information notification requirements under the ISHA. It concerns the information communicated to businesses handling those chemicals to support workplace chemical risk assessment and management.

From April 2030, suppliers of applicable chemical substances and mixtures would have to provide four additional items of information when making the required chemical hazard notification:

- a widely used unique number capable of identifying each component, such as a CAS Registry Number
- the appropriate type of respiratory protective equipment for the component, including the appropriate type of absorption canister where a gas mask or similar respirator is specified
- materials that are unsuitable for use as impermeable protective gloves, according to the component
- the chemical substance category for each component

The proposal therefore directly affects the information businesses must provide for chemicals subject to Japan's safety data sheet (SDS) notification requirements. The changes are intended to give downstream chemical-handling businesses more specific information for selecting protective equipment and identifying applicable chemical controls when conducting workplace risk assessments.

The draft is expected to be promulgated in October 2026 and take effect in April 2030, providing businesses with a transition period to update their chemical information and notification processes. The published proposal overview does not specify new penalties, fines, or fees. The consultation closed on 23 September 2026. If adopted as proposed, affected companies should update relevant SDS/notification processes before April 2030.

More information can be found in Japanese in this announcement.

Taiwan

Amendments to certain provisions of the Regulations for the Labeling and Hazard Communication of Hazardous Chemicals (in force)

On 26 August 2026, Taiwan's Ministry of Labor amended certain provisions of the Regulations for the Labeling and Hazard Communication of Hazardous Chemicals, Appendix 1 to Article 5, and Appendices 3 and 4 to Article 12. The amendments align Taiwan's hazard communication framework more closely with the eighth revised edition of the United Nations Globally Harmonized System (GHS) of Classification and Labeling of Chemicals and CNS 15030.[3]

The amended articles and Appendix 3 to Article 12 entered into force on 26 August 2026. The concentration threshold at which respiratory or skin sensitizing ingredients must be disclosed in a safety data sheet has been reduced from 1.0% to 0.1%. A disclosure threshold of 1.0% has also been introduced for ingredients classified as Aspiration Hazard Category 1.

[3] CNS 15030 is Taiwan's official series of national standards for the classification and labeling of chemicals, which adapts the UN GHS into local regulations.

 © 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

Chemicals classified in this category may no longer be withheld from SDS disclosure as confidential business information. The amendments also introduce a mechanism requiring manufacturers, importers, and suppliers to correct SDSs containing omissions, misstatements, or other obvious errors within a specified period.

The revised classification and labeling requirements in Appendix 1 to Article 5 and the revised SDS requirements in Appendix 4 to Article 12 will enter into force on 1 January 2029. The changes include the introduction of desensitized explosives, the subdivision of Flammable Gases Category 1 into Categories 1A and 1B, revised classifications for aerosols and chemicals under pressure, the removal of certain lower hazard categories, and revisions to SDS Sections 3, 9, 14 and 16.

More information can be found here in Chinese.

Requirements to submit hazard and exposure data for seven existing chemical substances (draft)

On 18 August 2026, Taiwan's Ministry of Environment (MOENV) announced that it will require certain registrants of carbon black (CAS No. 1333-86-4); 4,4'-methylenediphenyl diisocyanate – or MDI – (CAS No. 101-68-8); and silicon carbide (CAS No. 409-21-2) to submit hazard and exposure assessment information by 31 December 2027. While Article 2 of the Regulations of New and Existing Chemical Substances Registration defines a "registrant" generally as a person, legal entity, or other body subject to chemical-substance registration under Article 30 of the Toxic and Concerned Chemical Substances Control Act, the subsequent obligation to submit the hazard and exposure assessment information specified in Appendix 4 is established under Article 18, Paragraph 2. For this announcement (available in Chinese), the requirement applies to registrants of these three substances whose quantities fall within standard-registration tiers 2–4 and who hold standard-registration completion codes.

MOENV has published example hazard assessment reports for the three substances. Registrants adopting the applicable example do not need to submit separate hazard assessment information. Those preparing their own hazard assessments must complete a survey by 31 December 2026 and submit the assessment by 31 December 2027. All affected registrants must update the manufacturing, use and exposure information in their original registrations. Registrants that manufacture, formulate or use the substances, or expect to undertake such activities, must also submit exposure scenario information.

In a separate notice (available in Chinese), MOENV reminded previously designated registrants of antimony trioxide (CAS No. 1309-64-4), sulfuric acid (CAS No. 7664-93-9; noted as CAS No. 7664-93-3 in the August reminder), toluene (CAS No. 108-88-3), and zinc oxide (CAS No. 1314-13-2) to submit the applicable hazard and exposure assessment information by 31 December 2026. Registrants that adopt the applicable example hazard assessment report do not need to submit separate hazard assessment information but must still submit the required exposure assessment information. MOENV has also updated the example hazard assessment reports for these substances, including revisions to classification-table headings and more cautious wording where available evidence does not establish a particular hazard.

More information can be found here in Chinese.

United Kingdom

Changes to the GB Prior Informed Consent list (updated)

On 28 August 2026, the Health and Safety Executive (HSE) updated the Great Britain (GB) Prior Informed Consent (PIC) list to reflect decisions under the Rotterdam and Stockholm Conventions and export bans under the GB Mercury Regulation. New Part 3 entries include decaBDE (EC No. 214-604-9; CAS No. 1163-19-5) and perfluorooctanoic acid-related substances

and are subject to export notification and the importing country's consent. Part 4 adds priority organic pollutants entries subject to an export ban unless an applicable exemption or derogation applies. Part 5 now identifies additional mercury-containing products already subject to export bans under the GB Mercury Regulation, including mercury-added propellant for satellites and spacecraft, subject to specified exceptions.

Extension for submitting transitional registration information under UK REACH (in force)

Coming into force on 6 August 2026, the REACH (Amendment) (No. 2) Regulations 2026 extend the periods for submitting transitional registration information to the Health and Safety Executive (HSE) under UK REACH. Depending on the substance's tonnage and hazard profile, the three submission deadlines are now 27 October 2029, 27 October 2030, and 27 October 2031. The amendment also extends the period for protected transitional imports and moves the corresponding HSE compliance-check deadlines to 2030, 2032 and 2036.

The Batteries (Placing on the Market) (Northern Ireland) Regulations 2026 (draft)

Regulation (EU) 2023/1542 already applies directly in Northern Ireland under the Windsor Framework. The draft Batteries (Placing on the Market) (Northern Ireland) Regulations 2026 aims to establish domestic enforcement, offences, and penalties for its placing-on-the-market requirements, together with conformity assessment arrangements. Where a United Kingdom (UK) notified body carries out the required third-party assessment, the UK(NI) indication must accompany the CE marking.

The draft would revoke the Batteries and Accumulators (Placing on the Market) Regulations 2008 in relation to Northern Ireland, while retaining their capacity-labeling and removability provisions until the corresponding European Union (EU) requirements apply. Its Part 5 enforcement provisions generally would not apply to batteries placed on the market, made available or put into service before Part 5 commences, subject to the exceptions for subsequent modification and preparation for re-use, repurposing, or remanufacturing. The draft would also allow qualifying Northern Ireland batteries meeting the applicable EU and UK(NI) requirements to be placed on the Great Britain market as though they met the GB 2008 Regulations. This provision is set to commence when EU Article 11 applies, currently 18 February 2027, rather than on the draft's general commencement date.

The EU Batteries Regulation covers batteries incorporated into products but excludes batteries incorporated into or specifically designed for certain equipment intended for military purposes or to be sent into space. These exclusions arise from the EU Regulation, not the UK draft.

More information can be found in this UK guidance on EU battery requirements in Northern Ireland and in these relevant parliamentary dates.

Proposed Great Britain (GB) mandatory classification and labeling of twenty hazardous chemical substances (consultation)

On 7 August 2026, the United Kingdom notified the World Trade Organization of a Health and Safety Executive (HSE) proposal to amend the Great Britain Mandatory Classification and Labeling (GB MCL) list. The proposal would introduce new and revised mandatory classification and labeling entries for twenty hazardous chemical substances under the GB CLP Regulation. Key proposed classifications include:

- carcinogenicity Category 1B (H350) classifications for four EDTMP[4] substances and salts
- reproductive toxicity Category 1B classifications for bisphenol F (EC No. 210-658-2 CAS No. 620-92-8), piperonal (EC No. 204-409-7; CAS No. 120-57-0), (N-(1,3-dimethylbutyl)-N'-phenyl-p-phenylenediamine) (6PPD; EC No. 212-344-0; CAS No. 793-24-8), 2-pyrrolidone (EC No. 210-483-1; CAS No. 616-45-5), tebuconazole (EC No. 403-640-2; CAS No. 107534-96-3), 3,5-dimethylpyrazole (EC No. 200-657-5; CAS No. 67-51-6), and specified borate minerals.
- sor the listed boron compounds, Note 11 would require a mixture to be classified as toxic to reproduction where the combined concentration of the relevant boron compounds is at least 0.3%
- acute toxicity, specific target organ toxicity, skin sensitization, and aquatic hazard classifications for various substances – these include acute and chronic aquatic M-factors of 10,000 for 6PPD and acute and chronic aquatic M-factors of 100 and 10, respectively, for bronopol
- flammability, acute toxicity, aspiration hazard, skin irritation, skin sensitization, and aquatic hazard classifications for tea tree oil – a reproductive toxicity classification is not proposed at this stage, pending further HSE assessment

Comments were due on 6 October 2026. Adoption is expected in Q1 2027, with voluntary application from Q1 2027 and mandatory application from Q3 2028.

United States

Significant new use rules for thirty-five chemical substances and multi-walled carbon nanotubes (published)

On 25 August 2026, the US Environmental Protection Agency (EPA) published a final rule establishing Significant New Use Rules (SNURs) under Section 5(a)(2) of the Toxic Substances Control Act (TSCA) for thirty-five chemical substances reviewed under its new chemicals program. Manufacturers, importers, or processors must submit a Significant New Use Notification (SNUN) to EPA at least 90 days before initiating any activity designated as a "significant new use" for any of the thirty-five covered chemical substances. For occupational health and exposure, manufacturers and processors must adhere to specified exposure thresholds, implement mandatory respiratory protection requirements, where designated for specific substances, and satisfy strict consumer product use restrictions. For hazard communication, the final rule adds mandatory aquatic toxicity hazard communication requirements for five specific chemical substances where relevant language was previously omitted from the proposed rule.

Manufacturers, importers, and processors must maintain compliance records as specified under 40 CFR 721.125(a) through (k). Any person who exports or intends to export any of the subject chemical substances on or after 24 August 2026 must submit a one-time notification to the EPA for the first export or intended export to a specific destination country, pursuant to TSCA Section 12(b) and 40 CFR part 707, subpart D.

The following substances are exempt from the rule:

- substance P-22-0126 (maleated polyalkene, aminoethyl substituted heteromonocycle, carbopolycycle alkoxylated) is excluded from finalization due to new information requiring further agency review
- substance P-22-0187 (modified saccharomyces cerevisiae for improved production of ethanol) clarified as not being part of this proposed batch

The notice takes effect on 26 October 2026. There are no new penalties specified in this update.

[4] EDTMP = Ethylenediamine tetra(methylene phosphonic acid

On 24 July 2026, the EPA issued a final Significant New Use Rule under TSCA section 5(a)(2) for multi-walled carbon nanotubes (PMN P-22-163). This substance was previously subject to a TSCA section 5(e) Order. Following public notice, including comments from Cnano Technology USA, Inc. requesting expedited finalization, EPA is finalizing the rule to extend restrictions consistent with the underlying TSCA Order to all commercial entities. This Rule applies to all commercial importers, domestic chemical manufacturers, and processors of the generic chemical substance multi-walled carbon nanotubes.

Manufacturers, importers, or processors must submit a SNUN to the EPA at least 90 days before manufacturing, importing, or processing multi-walled carbon nanotubes (specifically PMN P-22-163) for any designated significant new use. The rule restricts commercial use of this substance solely to battery manufacturing.
Under this rule, significant new uses include:

- using the substance for any purpose other than as an additive in battery manufacture is considered a significant new use
- processing the substance without engineering controls that achieve at least 94 percent overall efficiency is restricted and requires prior notification
- processing or using the substance in final batteries at concentrations above the confidential limits specified in the TSCA Order is prohibited without submitting a notice
- processing the substance without NIOSH-certified respirators that provide an Assigned Protection Factor of at least 50 at the confidential site or battery recycling sites, or at least 1,000 at all other sites before monitoring results are received, is treated as a significant new use

Importers must comply with TSCA section 13 certification requirements under 19 CFR 12.118–12.127, and exporters must meet TSCA section 12(b) notification requirements under 40 CFR part 707, subpart D. Quantities embedded or incorporated into a cured polymer matrix, permanent solid polymer form, or article are not subject to these requirements, provided that no dust is generated during shredding or processing.

The rule took effect on 22 September 2026. Entities that began a designated significant new use before the effective date must cease the activity as of that date and submit a SNUN. There are no penalties specified in this update.

New Mexico per and polyfluoroalkyl substances implementing rule and reporting and labeling guidance (in force)

On 5 May 2026, the New Mexico Environmental Improvement Board published 20.13.2 NMAC, implementing the state's per- and polyfluoroalkyl substances (PFAS) protection act. The rule entered into force on 1 July 2026. The New Mexico Environment Department has also published reporting and labeling guidance and launched the New Mexico PFAS Reporting System. On 16 September 2026, a New Mexico District Court issued an injunction temporarily blocking the state from enforcing the mandatory PFAS labeling requirement while litigation proceeds. The state can appeal the injunction or allow the case to proceed to completion. The state could also abandon its defense of the labeling obligation. Neither court challenge implicates the upcoming reporting and material restriction imposed by New Mexico law.

By 1 January 2027, manufacturers of products or components containing intentionally added PFAS that are sold or distributed in New Mexico must report information through the online system. Required information includes a product description and identifier, the purpose of each PFAS, its CAS Registry Number, concentration or concentration range, manufacturer contact information, and documentation verifying any analytical method used. The initial reporting fee is $2,500, while reporting following a significant change costs $1,000. A manufacturer may not continue selling or distributing a covered product after 1 January 2028 unless the required report has been submitted.

© 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

Consumer products containing intentionally added PFAS that are manufactured for sale in New Mexico from 1 January 2027 must display an Erlenmeyer flask symbol containing the letters "PFAS". The label must be visible before purchase, including for online or telephone sales. Complex durable goods containing at least 100 manufactured components and having a useful life of at least five years may provide the symbol in consumer-facing specification sheets and operation and maintenance manuals instead of directly on the product.

Aircraft, lighter-than-air aircraft, seaplanes, and equipment directly used in their manufacture or development are exempt from the product prohibitions and reporting requirements. Products containing qualifying solid fluoropolymers are also exempt from those requirements. However, these exemptions do not automatically exempt an otherwise covered consumer product from labeling. Manufacturers of exempt products may apply for a labeling waiver where PFAS-containing materials will not come into direct contact with a consumer during the product's intended useful life. Waiver requests submitted by 31 October 2026 are treated as approved pending review unless subsequently denied.

Sales prohibitions begin on 1 January 2027 for cookware, food packaging, dental floss, juvenile products, and firefighting foam containing intentionally added PFAS. Further prohibitions covering carpets and rugs, cleaning products, fabric treatments, textiles, and other specified product categories take effect on 1 January 2028. From 1 January 2032, the prohibition will extend to other non-exempt products unless the PFAS use has been designated as currently unavoidable. Applications seeking a currently unavoidable use designation for products covered by the 2027 prohibitions must be submitted by 31 October 2026.

Violations may attract civil penalties of up to $15,000 per violation, in addition to administrative costs, and up to $25,000 for each day of continued non-compliance with an administrative order. More information can be found here.

Draft TSCA Risk Evaluations for trans-1,2-Dichloroethylene, 1,2-Dichloropropane, and ethylene dibromide (draft)

The United States Environmental Protection Agency released draft risk evaluations for trans-1,2-dichloroethylene (CAS No. 156-60-5), 1,2-Dichloropropane (CAS No. 78-87-5), and ethylene dibromide (CAS No. 106-93-4) for public comment. The preliminary evaluations identify unreasonable human-health risks under certain occupational and/or consumer conditions of use; the findings remain subject to public comment and further review.

The evaluations assess relevant conditions of use across the chemicals' lifecycles, including manufacture/import, processing, distribution, industrial and commercial use, consumer use where applicable, and disposal. Under the Toxic Substances Control Act (TSCA) Section 6, EPA's draft evaluations preliminarily identify unreasonable-risk concerns for workers and/or occupational non-users (ONUs) for all three substances.

trans-1,2-Dichloroethylene
Under Section I.C of its notice, unreasonable human-health risks are preliminarily identified. Under Section II.A, workers and ONUs face inhalation risks, and workers face dermal risks. Consumers face inhalation and dermal risks during product use (e.g., cleaners, degreasers, propellants).
1,2-Dichloropropane
Unreasonable health risks are identified across eleven occupational conditions of use for workers and ONUs, alongside three consumer uses as cleaners, polishes, or waxes.

Ethylene Dibromide (a.k.a. 1,2-dibromoethane)
Under Section I.C of its notice, unreasonable health risks are identified. Under Section II.A, workers face dermal and inhalation risks and ONUs face inhalation risks from manufacturing or handling leaded aviation fuel ("avgas"). Pilots

 © 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

(consumers) are exposed during aircraft refueling. Section II.B evaluates acute, intermediate, and chronic non-cancer and cancer risks.

Following public comment and Scientific Advisory Committee on Chemicals review, EPA will finalize the evaluations. Where unreasonable risk is confirmed, EPA may subsequently propose risk-management measures under TSCA Section 6(a).

Vietnam

Amendments to three decrees implementing the Law on Chemicals (draft)

Vietnam's Ministry of Industry and Trade has consulted on draft amendments (can be found in Vietnamese) to three decrees implementing the Law on Chemicals. The proposals could affect aerospace manufacturers and suppliers who manufacture, trade, import, or store regulated chemicals in Vietnam. Proposed changes should be distinguished from existing requirements retained in the consultation documents.

The draft amendment to Decree No. 24/2026/ND-CP (can also be found here in Vietnamese) would replace the lists of basic chemicals, chemicals subject to conditional production and trading, and specially controlled chemicals, and amend the chemical incident-planning lists. It also proposes mixture concentration thresholds and transitional arrangements. Specified licenses and certificates issued under Decree 26 before the amendment takes effect would remain valid until expiry, within their authorized scope.

The draft amendment to Decree No. 25/2026/ND-CP (can also be found here in Vietnamese) addresses product exclusions, chemical safety personnel, training, consulting certification, and incident planning, including changes to the substance and mixture criteria that trigger a Plan. The consultation document retains the existing cumulative storage calculation under Article 33(2)(b). It also retains the requirement for relevant operators with previously issued incident-response measures that meet this criterion to prepare and submit a plan to the competent authority for appraisal and approval before the existing transition deadline. These retained provisions should not be presented as newly introduced requirements.

The draft amendment to Decree No. 26/2026/ND-CP (can also be found here in Vietnamese) would revise chemical licensing procedures, safety-officer qualifications, and licensing exemptions. It also addresses non-commercial chemical returns, information-sharing through the specialized chemical database and disclosures before placing products containing hazardous chemicals on the market. Proposed finished-product exclusions apply to Chapter II and should not be assumed to cover manufacturing inputs or exempt products from every requirement in the decree. Specified older licenses would remain valid until expiry or issuance of a replacement special-control license, whichever occurs first.

Circular Economy

European Union

European Union rules for recycled plastic content in packaging (consultation)

On 14 August 2026, the European Commission launched a call for evidence for three upcoming draft acts. Article 7 of the Packaging and Packaging Waste Regulation (PPWR), formally regulation (EU) 2025/40 empowers the Commission to adopt, by 31 December 2026, three acts covering several aspects of packaging:

- calculation and verification of plastic recycled content in packaging
- sustainability criteria for plastic recycling technologies
- conditions for importing plastic recyclates or articles with incorporated plastic recycled content from third (non-European Union [EU]) countries

The draft act will apply to relevant plastic packaging placed on the EU market. The rules will affect all economic operators in the packaging supply chain including recyclers, manufacturers, brand owners, and importers.

The implementing act under Article 7(8) will establish the methodology for calculating and verifying recycled content recovered from post-consumer plastic waste, and the format for technical documentation.

The delegated act under Article 7(9) will supplement the Regulation with sustainability criteria for plastic recycling technologies. The criteria are to be based on an assessment of available recycling technologies, considering economic and environmental performance, output quality, the availability of the waste, the energy needed and the emissions of greenhouse gases and other relevant environmental impacts.

The implementing act under Article 7(10) will establish the methodology for assessing, verifying, and certifying equivalence, including through third-party audits, where the recycled content is recovered from post-consumer plastic waste collected or recycled in a third country.

The public consultation was open from 14 August 2026 to 16 September 2026. The European Commission plans to adopt the final acts in the fourth quarter of 2026, before the legal deadline of 31 December 2026. There are no penalties introduced in this update.

Environment

Australia

Improving the efficiency of climate-related financial disclosures (consultation)

On 24 August 2026, the Australian Treasury opened a public consultation on measures to improve the efficiency of Australia's mandatory climate-related financial disclosure regime, established under the Corporations Act 2001 and supported by the Australian Sustainability Reporting Standard AASB S2. The consultation does not change the underlying

disclosure obligations; it seeks feedback on three main proposals: i) changing assurance rules to reduce compliance costs, ii) providing clearer guidance on key terms and concepts, and iii) reducing the burden of value-chain (Scope 3) information requests including greater availability of emissions factors. Submissions closed on 2 October 2026.

For the aerospace and defense sector, the consultation is relevant to Australian-registered entities within the phased AASB S2 reporting groups and to organizations that receive value-chain information requests from in-scope Australian customers. Proposals to streamline Scope 3 data requests and expand available emissions factors could reduce supplier engagement and data-collection burdens across multi-tier supply chains. As these are proposals under consultation, they do not establish finalized obligations or penalties, but they indicate the likely direction of near-term refinements to the Australian regime.

China

Notice on Issuing the "National 15th Five-Year Plan for Addressing Climate Change" (published)

On 29 July 2026, China's Ministry of Ecology and Environment (MEE) and other government agencies issued the National Climate Change Response 15th Five-Year Plan (2026-2030). The plan establishes China's national climate-change strategy for the 2026-2030 period and outlines measures relating to greenhouse gas emissions reduction, carbon market development, climate adaptation, product carbon footprint management, and non-CO_2 greenhouse gas controls. The plan appears to function as a high-level policy and planning document. Further implementing regulations, standards, and sector-specific requirements may be issued separately.

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

2027 Quotas for ozone depleting substances and hydrofluorocarbons (consultation)

On 21 August 2026 (officially generated on 24 August 2026 as Environmental Protection Office Letter No. 278), the General Office of the Ministry of Ecology and Environment (MEE) published two draft schemes setting and allocating 2027 quotas for ozone depleting substances (ODS) and hydrofluorocarbons (HFCs) for public comments. The drafts propose quota allocations for controlled uses, exempted uses, and raw material (feedstock) applications while maintaining policy stability and supply chain security. The draft regulation covers:

- ODS (can be found here in English and in Chinese): Hydrochlorofluorocarbons (HCFCs), carbon tetrachloride (CTC), chlorofluorocarbons (CFCs), halons, and methyl bromide
- HFCs (can be found here in English and in Chinese): Eighteen fluorinated greenhouse gases listed under national regulations.

Regulated Companies

- chemical factories producing HCFCs, HFCs, or CTC
- factories using HCFCs to manufacture equipment (such as air conditioner makers)
- importers of HFC gases, including semiconductor makers, chemical traders, car makers, and medical tech firms
- companies using these chemicals as raw materials (feedstocks) to make other chemicals

General Exemptions

- Raw Material (Feedstock) Uses: Chemicals used entirely as raw materials to make other substances have no overall national limit, but factories must get a production permit

 © 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

- Exempted Controlled Uses: Laboratory reagents and auxiliary uses of CTC, as well as quarantine crop treatments using methyl bromide

Requirements

- Limits on ODS:
  - HCFC Production Limit: The total national production quota for controlled commercial uses is set at 151,416 tons (8,292.4 ODP tons)
  - HCFC Domestic Limit: The total national quota for domestic use is set at 79,724 tons (4,378.8 ODP tons)
  - CTC Limit: Total quota for CTC reagent and auxiliary applications is capped at 330 tons (unchanged since 2019); CTC by-product enterprises can apply for CTC raw material production quotas up to 8% of the production capacity of their methane chloride production facilities
- Limits on HFCs:
  - Baseline Limit: China's national HFC baseline is set at 905 million tons of CO_2 equivalent (tCO_2), based on 2020–2022 average levels
  - HFC Production Limit: Total national production cap for controlled uses is set at 1.853 billion tCO_2
  - HFC Domestic Limit: Total domestic use cap is set at 895 million tCO_2
  - HFC Import Limit: The total controlled-use import quota for HFCs is set at 0.1 billion tons of CO_2 (0.1 billion tCO_2), the same as in 2026
- Deadlines and Applications:
  - Quota Application Deadline: Chemical producers, baseline importers, and facility users must submit their 2027 quota applications to MEE by 31 October 2026
  - New Importers: Importers without baseline records can apply directly to the National ODS Import and Export Office for import approval permits if they have real trade demand
  - Baseline importers can only apply after they have exhausted their 2027 import quotas
  - New HFC Feedstock Facilities: Producers with externally selling HFC feedstock production facilities newly completed after 1 November 2026 may submit 2027 production quota applications by 30 April or 31 August 2027
- Rules for Changing Quotas:
  - companies can apply for mid-year quota adjustments by 30 April or 31 August 2027
  - adjustments between different HFC varieties cannot increase the tCO_2; adjustments between different ODS varieties cannot increase total ODP tons
  - except for conversion of an unused controlled-use production quota to feedstock production for the same substance, companies cannot change the original purpose of a quota (e.g., raw material quotas cannot be turned into controlled commercial quotas)
  - unused HFCs production quotas for controlled uses in the current year can be converted into raw materials of that variety
  - HFC-23 cannot be adjusted
  - the cumulative annual increase in the quota for 1,1,1,3,3-pentafluoropropane (HFC-245fa) shall not exceed 50% of the quota for that variety approved for the production enterprise according to the allocation method of this scheme
  - the cumulative annual increase in the quota for other HFC varieties shall not exceed 30% of the quota for that variety approved for the production enterprise according to the allocation method specified in this plan
  - production lines that have already received government payout money to close under national phase-out plans cannot apply for HCFC raw material quotas.

Enterprises that violate quota management rules or engage in illegal production or use of regulated substances will face statutory penalties under the Regulations on the Management of Ozone-Depleting Substances and will be denied 2027 controlled-use production permits for that chemical variety.

More information can be found in Chinese here in this announcement from MEE.

European Union

List of non-OECD countries authorized to import certain non-hazardous waste from the European Union under Regulation (EU) 2024/1157 (draft)

On 18 September 2026, the European Commission published a draft list of non-OECD[5] countries that could be authorized to import certain non-hazardous waste from the European Union (EU) under Regulation (EU) 2024/1157 on shipments of waste. From 21 May 2027, the Regulation will generally prohibit exports of non-hazardous waste from the EU to non-OECD countries, subject to applicable exceptions for destinations that request inclusion and demonstrate environmentally sound waste management. The Commission assessed requests from thirty-two countries and is consulting on the draft list until 16 October 2026. The first authorized-country list is expected by the end of 2026. The draft list does not itself authorize shipments or create a new export requirement; the applicable waste classification, destination and shipment conditions remain governed by the Regulation. The separate ban on exports of plastic waste to non-OECD countries begins on 21 November 2026.

For aerospace and defense organizations with EU operations that export potentially covered non-hazardous waste for recovery, the final destination list could affect available recycling and recovery routes and related arrangements with waste contractors. Relevance depends on the waste classification, the country of destination and the organization's role in the shipment; aerospace and defense activity alone does not establish applicability. Exports contrary to the Waste Shipment Regulation may be subject to enforcement and penalties under Member State rules. The draft list introduces no separate penalty amount, and its final country coverage remains subject to the Commission's assessment and adoption.

United States

Guidance on the California corporate greenhouse gas reporting (published)

On September 1, 2026, the California Air Resources Board (CARB) issued guidance for entities preparing their first Scope 1 and Scope 2 greenhouse gas emissions reports under Senate Bill 253 (Health and Safety Code section 38532). For the 2026 cycle, CARB will exercise enforcement discretion and allow reporting entities to submit prior-fiscal-year Scope 1 and Scope 2 information they already had or were collecting when CARB issued its December 2024 Enforcement Notice, whether the data received limited assurance. Entities that were not collecting and were not planning to collect Scope 1 and Scope 2 data at that time are not expected to submit emissions data for the 2026 cycle. CARB requests that those entities instead submit a statement of non-reporting on company letterhead. CARB's 2026 intake platform and draft reporting template are voluntary; submissions may be made through the platform or by email.

[5] Organization for Economic Co-operation.

Social/Governance Regulations

European Union

Amendment to Delegated Regulation (EU) 2023/2772 to simplify certain sustainability reporting standards (published)

Published in the Official Journal on 21 September 2026, Commission Delegated Regulation (EU) 2026/1563 replaces Annexes I and II of Delegated Regulation (EU) 2023/2772 with revised European Sustainability Reporting Standards. The revision simplifies reporting for undertakings required to report under Articles 19a and 29a of the Accounting Directive, including by reducing datapoints, prioritizing quantitative information, clarifying the application of materiality, and simplifying the standards' structure and presentation. It enters into force on 10 November 2026 and applies to financial years beginning on or after 1 January 2027. For financial years beginning in 2026, in-scope undertakings may use the prior standards or the revised standards; the Regulation also provides an option to use specified new reliefs with the prior standards. Undertakings using these transitional options must identify the version applied in their sustainability.

For aerospace and defense companies already within the applicable European Union sustainability reporting scope, the revised ESRS may change the disclosures and supporting data needed for their sustainability statements, including information drawn from complex operations and value chains. Sector membership alone does not determine whether a company is required to report. This Regulation changes the reporting standards rather than creating a new reporting duty. It does not specify a separate financial penalty for non-compliance; consequences for failure to meet an applicable reporting obligation are not established by this amendment alone.

Supplement to Directive 2013/34/EU to establish sustainability reporting standards for voluntary use by undertakings protected by the value chain cap (published)

Published in the Official Journal on 21 September 2026, Commission Delegated Regulation (EU) 2026/1560 establishes a sustainability reporting standard for voluntary use by undertakings not subject to mandatory reporting under Articles 19a and 29a of the Accounting Directive. The standard in Annex I has a Basic Module and an additional Comprehensive Module, covering environmental, social, and business-conduct information. Undertakings choosing to use the standard are not obliged by this Regulation to obtain assurance over the information they report. Separately, Article 3 and Annex II establish a value-chain cap: undertakings subject to mandatory sustainability reporting may not require information beyond the listed essential datapoints from value-chain undertakings that did not exceed an average of 1,000 employees during the preceding financial year, when gathering information for sustainability reporting under the relevant national law. The cap does not restrict requests needed to comply with other European Union or national laws. The Regulation entered into force on the third day following publication; the value-chain cap applies from financial years beginning on or after 1 January 2027.

For aerospace and defense companies, the distinction is between voluntary reporting and requests made to suppliers. A smaller supplier not subject to mandatory European Sustainability Reporting Standards reporting may choose the standard to communicate sustainability information, while an in-scope aerospace or defense reporting undertaking may need to account for the Annex II cap when seeking information from eligible value-chain undertakings for its own sustainability report. Applicability is determined by reporting status, the supplier employee criterion, and the purpose of the request, not by sector alone. The Regulation does not impose a reporting duty on an undertaking merely because it is eligible to use the

voluntary standard, and it does not specify a penalty for choosing not to use it; the cap is a separate limitation on covered information requests.

XBRL Taxonomy for the revised European Sustainability Reporting Standards (draft)

On 17 September 2026, the European Financial Reporting Advisory Group (EFRAG) released a draft XBRL taxonomy for the Revised European Sustainability Reporting Standards (ESRS) and opened a public consultation. The taxonomy provides the technical structure for representing European Sustainability Reporting Standards (ESRS) disclosures in machine-readable form. It reflects the Revised ESRS adopted in July 2026 and aligns with EFRAG's draft list of datapoints released in August 2026; unlike that list, it includes the additional technical attributes needed for digital representation. The draft replaces EFRAG's August 2024 taxonomy. Digital tagging of ESRS disclosures is not yet mandatory: the European Securities and Markets Authority (ESMA) and the European Commission still need to establish the regulatory framework for its implementation through the European Single Electronic Format (ESEF).

For aerospace and defense companies that report under the Corporate Sustainability Reporting Directive and ESRS, a future digital-tagging framework could affect the way sustainability information is structured and prepared for machine-readable publication. This consultation does not change the underlying ESRS disclosures or impose an immediate tagging obligation. EFRAG's announcement specifies no penalty for not using the draft taxonomy; any compliance consequences of future mandatory tagging would depend on the framework ultimately established by ESMA and the European Commission.

European Sustainability Reporting Standards for certain Non-European Union undertakings (draft)

On 23 July 2026, the European Financial Reporting Advisory Group (EFRAG) published its exposure draft of European Sustainability Reporting Standards for certain non-European Union (EU) undertakings (ESRS-40a) for public consultation (comments due on 31 October 2026). Developed as technical advice to the European Commission under Article 40a of the Accounting Directive, the draft addresses reporting on the impacts of qualifying non-EU groups on people and the environment. Under the amended Article 40a framework, the relevant non-EU undertaking must have generated more than EUR 450 million in EU net turnover in each of the last two consecutive financial years and have an EU subsidiary with more than EUR 200 million net turnover in the preceding financial year or, where it has no qualifying EU subsidiary, an EU branch with more than EUR 200 million net turnover in that year. EFRAG is seeking feedback on the proposed reporting perimeter, including global versus EU-related impacts, references to EU law and interoperability with other reporting standards. ESRS-40a remains an exposure draft; the European Commission has not yet adopted the final standard.

For aerospace and defense groups headquartered outside the EU, relevance depends on Article 40a turnover and EU subsidiary or branch criteria, not on sector alone. Qualifying groups could face new impact-reporting demands across operations and value chains, including the need to assess how proposed disclosures interact with commercially sensitive or classified information. The exposure draft does not itself establish a penalty amount or an immediate reporting duty. Any consequences for non-compliance with future reporting requirements will depend on the adopted standards and applicable national implementation and enforcement.

© 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

United Kingdom

Amendments to Section 54 of the Modern Slavery Act 2015 (draft)

Introduced in the United Kingdom (UK) House of Commons on 30 June 2026, the Immigration and Asylum Bill proposes changes to immigration, asylum, and modern slavery law. Clauses 44-49 and Schedule 5 would amend the Modern Slavery Act 2015 by prescribing content for annual slavery and human trafficking statements, including information on organizational structure, operations, and supply chains; identified risks and steps to assess or mitigate them; policies; due diligence; training; and effectiveness. The bill also proposes statement approval and accuracy declarations, publication within six months of the financial year-end, potential electronic submission requirements, and reporting by qualifying public authorities. These provisions are proposed and are not yet in force.

For aerospace and defense organizations within the existing UK commercial-organization reporting scope, the proposed changes could increase the specificity of supply-chain disclosures and the information needed to support them. If enacted, regulations could provide for financial penalties where an organization fails to comply without reasonable excuse, capped at the higher of 1% of its relevant total turnover or GBP 1 million; this penalty regime is not currently in effect under the bill. The bill itself does not create a sector-specific aerospace and defense reporting requirement.

© 2026 International Aerospace Environmental Group. ALL RIGHTS RESERVED RETURN TO TABLE OF CONTENTS

DISCLAIMER

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