



# **Regulatory Alert**

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

**Alert 35**

## Law No. 15,022 of November 13, 2024 (Establishes the National Inventory of Chemical Substances) Region: Brazil

### WHY IS THIS ALERT IMPORTANT?

If your company manufactures or imports chemical substances into Brazil, you are legally obligated to comply with [Law No. 15,022 of 13 November 2024](#), which entered into force upon its publication on 14 November 2024.

This law establishes the National Inventory of Chemical Substances, requiring registration, hazard evaluation, and risk management of substances produced or imported in Brazil at volumes of 1 tonne or more per year, based on a three-year average. The framework mandates reporting of substance identity (CAS/IUPAC), hazard classification (GHS), quantities, and uses. New substances require prior registration, and risk evaluations may lead to restrictions (e.g., bans, concentration limits) after public consultation.

The following are excluded from the scope of the law and are not subject to registration or other obligations: articles (e.g., aerospace components), substances used exclusively for national defense, research and development chemicals, and waste (Art. 3, items II, III, V, VI).

Failure to comply may result in administrative penalties, including fines (up to 40,000× minimum wage), product seizures, suspension of activities, or revocation of registrations.

### INTENDED AUDIENCE

This Regulatory Alert is intended for IAEG members, and their suppliers involved in the manufacture or import of chemical substances into Brazil. This includes direct importers, third-party purchasers (Article 2, VI), and foreign manufacturers represented by Brazilian agents (Article 2, XIII). It is particularly relevant to aerospace and defense companies dealing with substances such as polymers, adhesives, coatings, or fuels at or above 1 tonne per year (3-year average).

While downstream users (e.g., formulators, assemblers) are not required to register substances, they must comply with any applicable risk management measures.

### EXECUTIVE SUMMARY

Law No. 15,022 of 13 November 2024, published in the Official Gazette on 14 November 2024, establishes the National Inventory of Chemical Substances in Brazil. The law introduces a comprehensive framework for the registration, assessment, and risk control of chemical substances used, produced, or imported in the country, with the objective of minimizing adverse impacts on human health and the environment. Due to its structural and

procedural similarity to the European Union’s REACH Regulation, the legislation is commonly referred to as “Brazil REACH.”

The law requires manufacturers and importers to register chemical substances present in quantities equal to or greater than 1 tonne per year, based on the average volume over the previous three years. This requirement also applies to substances used as ingredients in mixtures. A designated Deliberative Committee may impose lower thresholds for specific substances if necessary. Certain categories of substances, such as radioactive materials and those used for national defense, are excluded from the scope.

A three-year period is provided for the development of digital systems to implement the National Inventory. Once these systems are operational, companies will have an additional three years to register existing substances. For new chemical substances, specific information must be submitted before production or importation begins. The complexity of this information depends on the danger the substance presents. Any changes to registered information must be reported by 31 March of the following year.

Substances listed in the inventory may be prioritized for risk assessment based on factors such as persistence, bioaccumulation, toxicity, carcinogenicity, endocrine disruption, or potential for human or environmental exposure. Depending on the results of the assessment, authorities may impose risk management measures including labelling adjustments, restrictions, authorizations, or prohibitions on production, importation, or use. Downstream users are not subject to registration obligations but must comply with risk management measures and maintain available and accurate information about their operations.

Non-compliance with the law may lead to administrative penalties, including warnings, fines, suspension of activities, or destruction of non-compliant substances. Information submitted to the inventory will generally be made public, although confidentiality may be granted under specific provisions. Unpublished studies submitted to support new substance registration may be protected for up to ten years. Requests for confidentiality of substance identity and CAS numbers may be granted for up to five years. A minimum protection period of one year applies even if such information becomes public in another country.

Additionally, the law establishes a Registration, Assessment, and Inspection Fee for Chemical Substances, applicable to manufacturers and importers. The fee structure varies based on the type of activity, such as registration or risk assessment, and also depends on the size of the company.

Brazil may also adopt streamlined procedures for registration and assessment when cooperation agreements are in place with countries whose regulatory controls are equivalent to or more stringent than those established under this law.

## BACKGROUND ON REGULATION

Prior to the enactment of Law No. 15,022 of 13 November 2024, Brazil did not have a unified legal framework for the registration and risk evaluation of industrial chemical substances. Regulatory oversight was fragmented, with certain sectors governed by product-specific laws, but no centralized mechanism existed to assess and manage the broader risks associated with chemical substances across industrial applications.

Law No. 15,022 fills this regulatory gap by introducing a structured system for chemical registration, prioritization, and risk management. The legislation aligns with key global practices, particularly the European Union’s REACH Regulation, and incorporates elements such as volume-based thresholds, hazard classification,

use reporting, public access to data, and a tiered risk assessment process. Its implementation is intended to strengthen domestic chemical safety governance and improve transparency across supply chains.

The law also allows for the prioritization of substances that are subject to international alerts, agreements, or conventions to which Brazil is a party, as specified under Article 14(§1)(VII). By establishing the National Inventory of Chemical Substances and enabling regulatory cooperation with countries that have equivalent chemical control systems, the law promotes consistency in the management of chemical risks and supports alignment with international practices.

## APPLICABILITY

Law No. 15.022 applies to manufacturers and importers of chemical substances that are produced or imported in Brazil in quantities equal to or greater than 1 tonne per year, based on the average over the previous three years. This includes substances used as ingredients in mixtures. However, mixtures themselves are not subject to registration (Art. 8, I).

Foreign manufacturers may appoint an exclusive representative established in Brazil to assume the responsibilities of an importer (Art. 2, XIII).

Downstream users such as formulators, assemblers, or distributors are not obligated to register substances (Art. 28, §2), but they must comply with applicable risk management measures and maintain accurate and accessible operational records.

Articles are also exempt from registration (Art. 8, II), but the substances they contain may be subject to registration if present in qualifying quantities.

## RELEVANT DATES

- » 14 November 2024: Law enters into force.
- » 14 May 2025: Deadline for implementing regulations (180 days; Art. 42).
- » 14 November 2027: Deadline to launch the digital system for the National Inventory (3 years; Art. 43).
- » 14 November 2030: Registration deadline for existing substances (3 years from system availability; Art. 10).
- » 31 March (annually): Deadline to update submitted data if changes occur (Art. 11).
- » Pre-registration: Required for new substances prior to production or import (Art. 12).

## REGULATORY OBLIGATIONS

- » **Registration:** Manufacturers/importers must register chemical substances (including those in mixtures) produced/imported in quantities  $\geq 1$  tonne/year (3-year average).
- » **New Substances:** Pre-registration required before production/import. Additional data mandatory for substances with hazardous properties (e.g., persistence, toxicity, carcinogenicity).
- » **Updates:** Annual updates by 31 March for changes in volume, classification, or uses.

- » **Compliance with Risk Measures:** Downstream users (e.g., distributors) must follow restrictions/authorizations.
- » **Fees:** Registration/assessment fees apply, varying by company size and activity type.

## RISKS TO AEROSPACE AND DEFENSE

- » **Registration Obligations:** Substances used in aerospace (e.g., coatings, fuels, adhesives) must be registered if produced/imported in quantities  $\geq 1$  tonne/year (3-year average), unless exempt.
- » **Defense Exemptions:** Substances used exclusively for national defense are exempt.
- » **Articles:** Finished articles (e.g., engines, structural components) are exempt. However, substances within articles (e.g., raw materials imported separately) must be registered if they meet the threshold.
- » **Prioritization:** Substances critical to aerospace may be prioritized for risk assessment if classified as persistent, bioaccumulative, toxic (PBT), carcinogenic, mutagenic, reprotoxic (CMR), or endocrine disruptors.
- » **Downstream Users:** Formulators and distributors must follow risk management measures, even if not subject to registration.
- » **Confidentiality:** Substance identity may be protected for 5 years; unpublished studies for up to 10 years.
- » **Penalties:** Non-compliance may result in fines (up to 40,000 $\times$  minimum wage), product seizure, or suspension.

## USEFUL LINK

[Law No. 15,022 of November 13, 2024](#)

## 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.