

Regulatory Alert

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

Alert 22.2



Environmental Protection and Management Act 1999 Region: Singapore

INTENDED AUDIENCE

This Regulatory Alert is intended for IAEG members who handle (including manufacture, import, export and/or use) certain environmentally hazardous substances.

EXECUTIVE SUMMARY

In order to protect human health and the environment, it is important that effective controls or management plans for environmental pollution (e.g. air, water and noise) and hazardous substances are established. In Singapore, the Environmental Protection and Management Act (EPMA) provides a regulatory framework that enforces environmental protection and control of hazardous substances.

This Regulatory Alert provides an overview of the EPMA, including its key amendments, and its implementing regulations: EPM (Hazardous Substances) Regulations, and EPM (Ozone Depleting Substances) Regulations.

BACKGROUND ON REGULATION

The EPMA, which was enacted by the National Environment Agency (NEA) on 1 April 1999, is Singapore's primary legislation for regulating environmental pollution in the following areas: air, water and noise pollution. The Act sets control measures for various hazardous substances, which provide protection and management of the environment and resource conservation, and related purposes.

The EPMA is divided into 13 Parts and 3 Schedules, which include:

- » **Part 4:** Air Pollution Control
- » **Part 5:** Water Pollution Control
- » **Part 6:** Land Pollution Control
- » **Part 7:** Hazardous Substances Control
- » **Part 9:** Licenses and Industrial Plant Works
- » **Part 10:** Environmental Pollution Control Measures
- » **Second Schedule:** Control of Hazardous Substances

There are also various implementing regulations that supplement the EPMA. The key regulations for aerospace and defense include:

- » **EPM (Hazardous Substances) Regulations** – provides additional obligations for environmentally hazardous chemicals
- » **EPM (Ozone Depleting Substances) Regulations** – provides additional obligations for ozone depleting substances [*see IAEG WG9 [Hydrofluorocarbon \(HFC\) Regulatory Alert](#) for further information*]

On 1 June 2016, Singapore's Ministry of the Environment and Water Resources (MEWR) published an amendment to the Second Schedule of the EPMA (in force: 1 June 2017), commonly known as the Singapore Restriction of Hazardous Substances (RoHS) Regulation. The amendment aims to reduce levels of hazardous substances in electrical and electronic equipment (EEE) by establishing maximum concentration values for certain hazardous substances [[see RoHS Regulations Regulatory Alert for further information](#)].

On 31 May 2022, the NEA published an amendment to the Second Schedule of the EPMA, and Schedule to the EPM (Hazardous Substances) Regulations (in force: 1 March 2023). The amendment further implements Singapore's obligations under the Stockholm Convention and Rotterdam Convention by adding the following 3 substances (relevant to aerospace and defense):

- » **nonylphenol (NP) and nonylphenol ethoxylates (NPE)** [CAS No. 25154-52-3, 84852-15-3, 11066-49-2, 90481-04-2, 9016-45-9, 26027-38-3, 37205-87-1, 68412-54-4, 127087-87-0 and 104-40-5] – used in oil additives, latex paints and solubilizers
- » **dechlorane plus (DP)** (CAS No. 13560-89-9) – used in polymers and as a flame retardant
- » **UV-328** (CAS No. 25973-55-1) – used in plastics and coatings

APPLICABILITY

The EPMA, including the RoHS Regulation (Amendment to Second Schedule of EPMA, 2016), apply to hazardous substances listed on Part I of the Second Schedule. The implementing regulations [EPM (Hazardous Substances) Regulations, the EPM (Ozone Depleting Substances) Regulations] apply to substances provided in the Schedules. Prohibitions, restrictions and other obligations for these substances apply to stakeholders such as manufacturers, importers, exporters, and users including distributors (*see 'Regulatory Obligations' section of this Regulatory Alert for further information*).

General exemptions for hazardous substances (given in Part I of the Second Schedule) are listed in Part II of the Schedule. These include:

- » adhesives other than those containing pentadecafluorooctanoic acid (PFOA; including its salts and related compounds), perfluorohexane sulfonic acid (PFHxS; including its salts and related compounds), polychlorinated naphthalenes or short-chain chlorinated paraffins
- » electrical valves
- » explosives
- » fillers other than those containing PFOA (including its salts and related compounds), PFHxS (including its salts and related compounds)
- » lubricants other than those containing polychlorinated naphthalenes or short-chain chlorinated paraffins
- » paints other than those containing asbestos, lead compounds, mercury compounds, PFOA (including its salts and related compounds), PFHxS (including its salts and related compounds), polychlorinated naphthalenes or short-chain chlorinated paraffins
- » pigments other than those containing tributyltin compounds
- » plastics other than those containing polychlorinated naphthalenes or short-chain chlorinated paraffins;
- » propellants other than those containing ozone depleting substances
- » rubber
- » varnishes other than those containing PFOA (including its salts and related compounds), PFHxS (including its salts and related compounds)

Specific exclusions for the hazardous substances are provided in Part I of the Second Schedule (see second column of the Second Schedule).

RELEVANT DATES

- » EPMA enacted: 1 April 1999
- » EPM (Hazardous Substances) Regulations enacted: 1 April 1999
- » EPM (Ozone Depleting Substances) Regulations enacted: 1 January 2001
- » Amendment to Second Schedule of EPMA (RoHS Regulation) published: 1 June 2016
- » Amendment to Second Schedule of EPMA (RoHS Regulation) in force: 1 June 2017
- » Amendment to Second Schedule of EPMA and Schedule of EPM (Hazardous Substances) Regulations published: 31 May 2022
- » Amendment to Second Schedule of EPMA and Schedule of EPM (Hazardous Substances) Regulations in force: 1 March 2023

REGULATORY OBLIGATIONS

The EPMA and implementing regulations [EPM (Hazardous Substances) Regulations, and EPM (Ozone Depleting Substances) Regulations] set various obligations, including:

- » prohibition of the import, manufacture or sale (including possession or offer for sale) of hazardous substances without a license [**Article 22 of the EPMA**]
- » any person who wishes to transport a hazardous substance in quantities exceeding those specified in the Schedule must apply for transport approval [**Part II of the EPM (Hazardous Substances) Regulations**]
- » any person who has been granted a license to import hazardous substances into Singapore must ensure the container used is designed, constructed, maintained and labeled in accordance with the appropriate code of practice [**Part III of the EPM (Hazardous Substances) Regulations**]
- » any person intending to use or store hazardous substances must have authorization and be issued with a permit (issued for a specified period and may contain specific conditions for storage and use) [**Part IV of the EPM (Hazardous Substances) Regulations**]
- » prohibition of the sale or supply of hazardous substances to any person who is not authorized to store the substances [**Part IV of the EPM (Hazardous Substances) Regulations**]
- » any company that imports or exports HFCs listed in the Second Schedule must obtain a hazardous substances license from the NEA (Pollution Control Department) [**Part I of Second Schedule of EPMA**]
- » no person shall import into Singapore from, or export out of Singapore to, any country which at the time of importation or exportation is not a party to the Montreal Protocol (for Annexes A to E controlled substances) [**Article 3 of EPM (Ozone Depleting Substances) Regulations**; see [HFC Regulatory Alert for further information](#)]
- » manufacturers and importers must submit a declaration of conformity for controlled EEE to the NEA, and a technical file needs to be prepared and kept in accordance with the standard EU BS EN 50581:2012, or an equivalent standard [**Amendment to Second Schedule of EPMA (RoHS Regulation)**; see [RoHS Regulations Regulatory Alert for further information](#)]

The aforementioned obligations for hazardous substances also apply for the **Amendment to Second Schedule of EPMA and Schedule of EPM (Hazardous Substances) Regulations**, which adds three hazardous substances (relevant to aerospace and defense).

2025 AMENDMENTS SUMMARY

Two amendments to the Second Schedule of the EPMA were published in 2025. These updates introduce new exemptions and labelling requirements for specific hazardous substances and may be relevant to aerospace, defense, and industrial users:

- » [No. 2 Order 2025](#) (published 31 January 2025, in force 1 January 2026) updates the listing for formaldehyde to include the following for formaldehyde and formaldehyde in paints:
 - exemptions for photographic glazing or hardening solution
 - exemptions for substances (excluding paint) with $\leq 5\%$ formaldehyde by weight
 - exemptions for paint with $< 0.01\%$ formaldehyde by weight
 - permission for paints containing formaldehyde for outdoor or industrial use, provided the product is labeled according to new rules
 - introduction of a new Part IV to the Second Schedule, specifying mandatory label wording and minimum label dimensions based on container size

- » [No. 3 Order 2025](#) (published 21 March 2025, in force 24 March 2025) revises the entries for dechlorane plus and UV-328 as follows:
 - adds detailed use-based exemptions for each substance in sectors including aerospace and defense
 - lists specific product categories and replacement parts that may continue to contain the substances
 - amends numerous entries in Part II to restrict various materials (e.g. inks, paints, lubricants, varnishes) unless they are free from dechlorane plus or UV-328

RISKS TO AEROSPACE AND DEFENSE

Penalties for non-compliance include fines of up to \$50,000 (Singapore Dollars) and/or imprisonment up to 2 years. A further fine of up to \$2,000 (for every day) may be given if the offense continues after conviction.

USEFUL LINKS

[EPMA](#)

[EPM \(Hazardous Substances\) Regulations](#)

[EPM \(Ozone Depleting Substances\) Regulations](#)

[EPMA 1999 \(Amendment of Second Schedule\) Order 2022](#)

[HFC Regulatory Alert](#)

[RoHS Regulatory Alert](#)

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