

# Newsletter

Global Environmental and  
Chemical Regulations, Policies,  
and Standards

July 2024  
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# NEWSLETTER

*Global Environmental and Chemical Regulations, Policies, and Standards*  
July 2024



## 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 in place worldwide. The complexity and variability of requirements and guidance has 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 environmental and chemical 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 environmental and chemical regulations relevant to the AD industry. Contact Lisa Brown at [myrna.l.brown@lmco.com](mailto:myrna.l.brown@lmco.com) or Lindsey Bean at [lindsey.bean@ngc.com](mailto:lindsey.bean@ngc.com) for any questions on this Newsletter. For general assistance on IAEG matters, contact Michele Lawrie-Munro at [mlawriemunro@iaeg.com](mailto:mlawriemunro@iaeg.com).

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## GLOBAL

### [Amendments to Annexes II, VIII and IX of the Basel Convention on e-waste \(draft\)](#)

The United Nations (UN) released a draft update from the Open-ended Working Group meeting held on between 25 and 28 June 2024 concerning [amendments to Annexes II, VIII, and IX](#) of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. The Basel Convention, adopted in 1989 and effective since 1992, is a global agreement aimed at protecting human health and the environment from the adverse effects of hazardous waste management and transboundary movements.

This update focuses on incorporating adjustments related to the e-waste amendments adopted at the sixteenth Conference of the Parties. These amendments are reflected in various guidance documents, technical guidelines, and fact sheets to ensure they are aligned with the new e-waste regulations. The amendments aim to enhance the environmentally sound management of e-waste and include updates to documents such as inventories of waste electrical and electronic equipment, fact sheets on specific waste streams, and technical guidelines on the management of various hazardous wastes.

The draft updates propose changes such as adding new e-waste entries, updating references, and revising guidelines to reflect the new regulations. The Open-ended Working Group reviewed these draft updates and recommended that they be considered by the Conference of the Parties at its seventeenth meeting. The Secretariat has been requested to make these updates available in all six official UN languages, subject to resource availability.



## AFRICA

### [South Africa](#)

#### [Extension of the commencement date of the regulations to domesticate the requirements of the Rotterdam Convention on the prior informed consent procedure for certain hazardous chemicals and pesticides in international trade \(draft\)](#)

The government of South Africa has [extended the commencement date](#) of the regulations to implement the requirements of the Rotterdam Convention on the prior informed consent procedure for certain hazardous Chemicals and pesticides in international trade. Regulations will commence on 2 April 2026, 660 days from publication in the Government Gazette. The Rotterdam Convention is an international environmental treaty that aims to protect human health and the environment from the harmful effects of certain hazardous pesticides, pesticide formulations, and industrial chemicals by promoting

their environmentally sound use, facilitating information exchange about their characteristics, providing a decision-making process on their import and export, and by disseminating those decisions to stakeholders.

The chemicals listed in Annex III of the Convention include pesticides and industrial chemicals that have been banned or severely restricted for health or environmental reasons by two or more parties to the Convention. They are subject to the Prior Informed Consent (PIC) Procedure.

The Convention applies to banned or severely restricted chemicals and severely hazardous pesticide formulations. The Convention does not apply to narcotic drugs and psychotropic substances; radioactive materials; wastes; chemical weapons; chemicals in quantities not likely to affect human health or the environment provided they are imported for the purpose of research or analysis; or by an individual for his or her own personal use in quantities reasonable for such use. Mixtures containing Annex III substances may also be regarded as listed in Annex III depending on the mixtures Harmonized System code.

## Declaration of chemical goods and missile technology as controlled goods (in force)

South Africa's Department of Trade, Industry and Competition has declared certain chemical goods as controlled goods under the Non-Proliferation of Weapons and Mass Destruction Act (87/1993). This declaration includes control measures applicable to these goods to prevent their use in weapons of mass destruction.

The [declaration](#) specifies a comprehensive list of chemical goods and other goods including missile technology that are now classified as controlled goods. These include precursors and intermediates considered anti-plant agents. The control measures outlined mandate strict documentation and authorization requirements for the manufacture, possession, and transfer of these chemicals. Companies dealing with these substances must comply with the new regulatory framework to avoid misuse in proliferation activities.

The regulation came into force on 14 June 2024. Companies must ensure compliance with these measures to avoid penalties. Penalties for non-compliance include severe fines and potential imprisonment for responsible individuals.



## ASIA

### [China](#)

#### Amendment to the national standard limits of restricted substances in electrical and electronic products to include limits for four additional phthalates (published)

The Chinese State Administration for Market Regulation has approved the [first amendment](#) to the national standard on the limits of restricted substances in electrical and electronic products (RoHS). The amendment, which was published on 29 June 2024, amends the standard so that it now includes limits for four additional phthalates:

- » dibutyl phthalate (CAS No. 84-74-2) – less than or equal to 0.1%

- » diisobutyl phthalate (CAS No. 84-69-5) – less than or equal to 0.1%
- » butyl benzyl phthalate (CAS No. 85-68-7) – less than or equal to 0.1%
- » bis(2-ethylhexyl) phthalate (CAS No. 117-81-7) – less than or equal to 0.1%

The standard which supports RoHS in China also includes limits for other substances, including lead, mercury, hexavalent chromium, polybrominated biphenyls, polybrominated diphenyl ethers, and cadmium. The addition of the four phthalates and their limits ensures that China's RoHS regulatory framework aligns fully with international standards.

While there are no penalties associated with this update, those affected by RoHS in China should be aware of the amendment ahead of its entry into effect from 1 January 2026.

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

## Addition of thirty-four new chemical substances to the Inventory of Existing Chemical Substances in China (published)

The Ministry of Ecology and Environment added thirty-four new chemical substances to the Inventory of Existing Chemical Substances in China under the Measures for Environmental Management Registration of New Chemical Substances. This update means these substances are now managed as existing chemical substances, with specific new use environmental management requirements for some.

For chemical substances marked with new use environmental management scope, additional oversight is applied to their use. This change affects companies by requiring them to comply with the updated management practices for these substances to ensure they are used within the stipulated environmental guidelines. Companies need to be aware of the new regulations and ensure compliance to avoid penalties. The specific compliance deadlines and potential penalties for non-compliance have not been detailed in this announcement.

More information, including the list of added substances, can be found [here](#) in Chinese.

## India

### Changes to the range of chemicals exempt from adhering to mandatory quality control orders (published)

On 6 June 2024, India's Directorate General of Foreign Trade (DGFT) issued [Public Notice No. 10/2024-25](#) to broaden the range of chemicals exempt from adhering to mandatory quality control orders (QCOs) to include all QCOs issued by the Department of Chemicals and Petrochemicals (DCPC). This change pertains to substances imported for use in products destined for export.

This notice follows a similar announcement made by the DGFT in March 2024, which indicated that certain manufactured substances, such as basic chemicals, cosmetics, and dyes, would be exempt from QCOs. The DGFT has extended these exemptions to encompass all QCOs issued by the DCPC. The QCO exemptions will apply to manufacturing units located in special economic zones and export-oriented units, which are primarily established for exporting these products. Imports under the Advanced Authorization Scheme will also be exempt.

The broadening of the exemption to all QCOs issued by the DCPC is likely to affect those in the aerospace and defense industry intending to use imported substances for use in products intended for exportation. The DGFT specifies that for imported substances exempt from QCOs, the manufacturer must fulfill the declared export obligations for finished products and goods within 180 days of being cleared from the port of arrival.

## [Israel](#)

### Additional permit conditions regarding use of per- and polyfluoroalkyl substances (effective)

On 30 June 2024, the Ministry of Environmental Protection published a notice announcing [additional permit conditions](#) concerning the use of per- and polyfluoroalkyl substances (PFAS). These conditions are effective immediately and supplement existing permit requirements. The update includes definitions for key terms such as firefighting training, firefighting system testing, sludge, certified wastewater sampler, best available technique (BAT), certified laboratory, contaminated runoff, and hazardous waste containing PFAS.

Within two months, businesses must submit information about PFAS-containing toxins based on Safety Data Sheets (SDS). If the SDS or manufacturer information references PFAS compounds without detailing them, businesses must sample the toxins as specified. Additionally, businesses are required to conduct a techno-economic assessment within one year to explore reducing or replacing PFAS use and to prepare a plan outlining necessary steps and timelines. This plan must be updated every three years or as required.

For firefighting foams containing PFAS, businesses must switch to using these foams only for flammable liquid fire scenarios (class B) and cease their use for other scenarios such as solid fires (class A) within six months. Within 18 months, businesses must perform firefighting system integrity tests using water or PFAS-free foams unless the system's design and operation standards specifically require PFAS-containing foams. Furthermore, businesses must stop using PFAS-containing foams for training purposes within 18 months and immediately start managing and disposing of PFAS-contaminated waste from training activities as hazardous waste.

Maintenance and monitoring procedures are also emphasized. Businesses must maintain and inspect equipment for PFAS emissions monthly, ensuring proper collection and treatment of PFAS-contaminated waste. Relevant procedures and protocols must be updated within six months, covering aspects such as managing leaks or spills and conducting visual inspections.

The regulation mandates that hazardous waste containing PFAS be stored separately to prevent mixing with other wastes within six months. PFAS-containing packaging must be labelled and disposed of as hazardous waste in compliance with regulatory requirements. Regular sampling of PFAS concentrations in industrial effluents is required before discharge. These samples must be analyzed by certified laboratories using standard methods, with records maintained for at least three years and submitted as required.

Penalties are not mentioned in the update.

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

## Japan

### Order amending the Order on the Manufacture, etc. of New Use Mercury-Using Products (amendment)

Effective upon its publication on 26 April 2024, Japan has amended the Order on the Manufacture, etc. of New Use Mercury-Using Products, pursuant to the provisions of Article 13 of the Act on Prevention of Environmental Pollution by Mercury (Act No. 42 of 2015). This Act implements the Minamata Convention on Mercury in Japan. The following products were added to the “mercury-containing product for existing purpose” list. These products can now be manufactured and placed in the market in Japan:

- » propellants, used in aerospace applications to generate thrust
- » radiation thermometers, used for measuring surface temperature
- » pressure regulators, used to adjust and maintain pressure
- » wheel balancers, used for shock absorption and vibration reduction
- » photographic film, used for photosensitivity
- » photographic paper, used for photosensitivity

All requirements and penalties applicable under the Order on the Manufacture, etc. of New Use Mercury-Using Products also apply to these newly listed products.

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

### Changes to the list of poisonous and deleterious substances (published)

On 29 May 2024, the Japanese Ministry of Health, Labor, and Welfare (MHLW) published the changes to the list of deleterious chemical agents covered by the Poisonous and Deleterious Substances Control Law (PDSCCL). The changes add new substances to the list, remove other entries, and change the concentration thresholds for others.

Deleterious substances are approved based on their level of acute toxicity, with the complete list containing nearly 3,000 entries. The PDSCCL ensures that these substances are subject to additional requirements in order to prevent harm to human health and the environment. These requirements include license requirements for manufacturers, importers, and distributors of listed substances, as well as mandatory safety data sheet and labeling requirements. There are no new penalties associated with this update.

More information can be found here [in English](#) and [in Japanese](#).

### Amendment to the Enforcement Order of the Act on the Examination and Regulation of Manufacture, etc. of Chemical Substances to establish technical standards for per- and polyfluoroalkyl substances in fire extinguishing (published)

Japan has published an Order amending the Enforcement Order of the Act on the Examination and Regulation of Manufacture, etc. of Chemical Substances, specifically the section that established the technical standards for fire extinguishers, fire extinguishing agents for fire extinguishers, and foam fire extinguishing agents using perfluorooctanoic acid (PFOA; CAS No. 335-67-1), perfluorooctanesulfonic acid (PFOS; CAS No. 1763-23-1), or their salts. The new requirements include labeling containers, packaging, and invoices with the following:

- » substance name and ratio

- » the contact information of the company
- » measures to be taken in case of accident

Additionally, new standards were announced for the safe storage of these products and record-keeping requirements. The amendments entered into force on 1 June 2024.

More information can be found here [in English](#) and [in Japanese](#).

## [South Korea](#)

### Re-enactment of partial revision to the Enforcement Decree of the Act on Registration and Evaluation of Chemical Substances (draft)

The Ministry of Environment published a notice announcing the re-enactment of the partial revision of the Enforcement Decree of the Act on Registration and Evaluation of Chemical Substances. This revision says that if a chemical substance manufactured from the recycling of waste is identical to an already registered chemical substance, then there is no need to register the substance obtained from the recycling process.

A three-day consultation was opened for this revision. This revision had already been proposed by the ministry previously but not approved. No further information on implementation or approval timeline has been given.

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

### Amendment to the Regulation on Classification and Labeling of Chemicals (draft)

On 30 May 2024, the Chemical Safety Institute of South Korea announced a draft amendment to the Regulation on Classification and Labeling of Chemicals, with comments due by 19 June 2024. The draft amendment specifies classification and labeling requirements for newly designated hazardous substances and update existing classifications based on additional data obtained through hazard assessments under the Chemicals Registration and Evaluation Act.

Detailed changes include the addition of eleven new hazardous classifications and labeling requirements for substances, including trifluoride phosphorus, establishing new unique identifiers from "2024-1-1213" to "2024-1-1223." The draft amendment also revises classifications for three existing hazardous substances and adds an aquatic environmental hazard symbol (GHS09) for one substance. Additionally, specific CAS numbers are required for the isomers of two substances. The amendment requires stakeholders to comply with updated labeling requirements under the Chemicals Management Act, with provisions for transitional measures provided in the enforcement provisions.

More information can be found here [in English](#) and [in Korean](#).

## Taiwan

### Amendment to the Regulations for Governing, Designating, and Handling of Priority Management Chemicals (published)

Taiwan's Ministry of Labor has published an order amending the Regulations for Governing, Designating, and Handling of Priority Management Chemicals. This regulation sets the reporting, notification, and management requirements for Priority Management Chemicals. Priority Management Chemicals are hazardous chemicals classified as follows:

- » hazardous chemicals as defined in Subparagraph 3, Paragraph 1, Article 29 and Subparagraph 5, Paragraph 1, Article 30, as specified in Appendix 1
- » chemicals that are classified as any of the following categories according to the R.O.C. National Standards (CNS) 15030, and designated and announced by the central competent authority as follows:
  - carcinogen, mutagen, or reproductive toxicant
  - respiratory sensitization, Category 1
  - serious eye damage/eye irritation, Category 1
  - specific target organ systemic toxicity-repeated exposure, Category 1
- » chemicals possessing physical hazards or health hazards according to CNS 15030, and designated and announced by the central competent authority
- » others designated and promulgated by the central competent authority

Key Amendments:

- » regular reporting – once the initial report has been completed, operators must carry out new reports yearly, with the submission period varying depending on the type of chemical
- » notification of exceeding volume limits – if the volume limits are exceeded at any point, it must be reported to the authorities within 30 days

This amendment aims to enhance the management of hazardous chemicals, ensuring compliance with updated standards and improving overall safety and regulatory oversight. The changes took effect on 6 June 2024, the day of promulgation. Penalties for non-compliance remain in place, with fines issued by the authorities for violations.

More information can be found here [in English](#) and [in Chinese](#).

### Amendment to the Permit Registration and Approval Regulations for Toxic and Concerned Chemical Substances (amendment)

On 11 June 2024, the Ministry of Environment in Taiwan published an amendment to the Permit Registration and Approval Regulations for Toxic and Chemical Substances to streamline the permit application process, enhance regulatory compliance, and ensure the safe handling and storage of toxic and chemical substances. The update allows operators involved in manufacturing, importing, exporting, selling, or using these substances to apply for a combined permit if all operational sites are within the same municipality or county. Specific guidelines prohibit storing large quantities of toxic substances in urban residential or commercial areas. For instance, Class I to III toxic chemical substances cannot be stored in such areas if they reach a certain operational volume, while Class IV substances have stricter quantity limits: 50 kilograms (kg) for gases, 100 kg for liquids, and 200 kg for solids.

Warehouses used for storage must have the necessary registration or approval documents, though temporary storage in customs warehouses is exempt from these requirements. Operators are now required to create detailed maps showing the

flow of air, water, waste, and pollutants within their operational sites before applying for, changing, or extending permits. This requirement is waived for small-scale operations used solely for research, testing, or educational purposes.

Local authorities must review permit applications without imposing additional unregulated obligations and may involve experts for on-site inspections. Applications lacking required documents or unpaid fees within the specified timeframe will be rejected. Issued permits must include detailed information about the operator, the operational site, and specifics about the chemical substances. Authorities can correct any errors found in the permits and notify the operators accordingly.

For exportation, operators exporting Class I to III toxic chemical substances must register each batch or shipment with local authorities and provide documentation such as buyer orders and letters of credit. Exporting Class IV substances and concerned chemical substances must comply with the approval document content.

Under the broader regulatory framework of the Toxic Chemical Substance Control Act, the categorization of toxic chemical substances into four classes is as follows:

- » Class I – chemicals that are not easily biodegradable and can harm human health or the environment through bioaccumulation or biotransformation
- » Class II – Chemicals that cause genetic mutations, infertility, tumors, or other chronic health issues
- » Class III – Chemicals that pose an immediate threat to human health or the lives of biological organisms upon exposure
- » Class IV – Chemicals that have the potential to harm human health or the environment

Penalties are not mentioned in the update.

More information can be found here [in English](#) and [in Chinese](#).



## EUROPE

### [Austria](#)

#### Amendment to the Air Emissions Act 2018 (in force)

On 5 June 2024, the Austrian National Council announced an amendment to the Air Emissions Act 2018. This amendment introduces significant changes aimed at aligning with European Union (EU) directives and enhancing environmental protection measures. The update incorporates references to Directive (EU) 2016/2284 and its subsequent amendments to comply with the latest version of this directive. Directive (EU) 2016/2284 focuses on the reduction of national emissions of certain atmospheric pollutants, amending and repealing previous directives to strengthen emission controls. Sections 5(1) and (2) and Section 8(1) now include the phrase "as amended" to reflect this alignment.

Section 10 has been extensively revised to detail the supervisory activities and penalties for non-compliance. The district administrative authority is tasked with monitoring adherence to ordinances issued under Section 7(6). Authorities and their experts are authorized to enter land, buildings, and installations to perform their supervisory duties, with urgent access

allowed without prior permission if necessary. Also, penalties for violations include fines of up to 3,630 euros for using prohibited fertilizers or failing to comply with regulations issued under Section 7(6).

The amendment updates Section 12 to reflect the implementation of Directive (EU) 2016/2284 and Delegated Directive (EU) 2024/299 pertaining to reporting emission projections for certain pollutants.

Additionally, a new paragraph in Section 15 states that the amendments will come into force at the end of the publication day of the Federal Law Gazette I No. 57/2024 (i.e., 5 June 2024). References to "sustainability and tourism" have been updated to "climate protection, environment, energy, mobility, innovation, and technology."

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

## [Bulgaria](#)

### [Establishment of a new list of defense-related products and a list of dual-use items and technologies subject to import control \(in force\)](#)

The Ministerial Council has adopted Resolution No. 208 of 7 June 2024, establishing a new list of defense-related products and a list of dual-use items and technologies subject to import control. This resolution repeals Decree No. 422 of 2022 and aligns with the requirements of the Commission Delegated Directive (EC) 2024/242, which updates the list of defense-related products in accordance with the Common Arms List of the European Union (EU). The resolution has immediately entered into force.

The newly adopted lists, detailed in [Annex I](#) and [Annex II](#), cover a wide range of defense-related products and dual-use technologies. The lists regulate items and technologies that require import control to ensure compliance with national and EU regulations. This update necessitates that companies dealing with these products and technologies comply with the revised import control requirements. This impacts industries by mandating adherence to updated compliance protocols, affecting the importation process of these items. The lists include aircraft, explosives, surveillance equipment and other products relevant to the aerospace and defense industries.

The resolution is enforced by the Minister of Economy and Industry. There are no penalties mentioned in this update. The resolution's immediate effect ensures that all relevant stakeholders are promptly informed of the new regulations, enabling them to adjust their import procedures accordingly.

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

## [European Union](#)

### [Directive \(EU\) 2024/1760 on corporate sustainability due diligence \(in force\)](#)

The European Parliament has published [Directive \(EU\) 2024/1760](#) on corporate sustainability due diligence, amending Directive 2019/1937 and Regulation 2023/2859. This directive establishes rules and obligations for companies regarding actual and potential human rights and adverse environmental impacts within their operations. It details liability for violations and mandates companies to adopt and implement a climate change mitigation transition plan.

The directive applies to companies that had more than 1,000 employees and a net worldwide turnover of more than €450 million, or to parent companies of groups meeting this threshold. The directive may also apply to companies involved in franchising should they meet the requirements under Article 2(1)(c), or to other companies meeting the criteria set out in Article 2.

Member states must ensure companies conduct risk-based human rights and environmental due diligence as specified in Articles 7 to 16, integrating these practices into policies and risk management systems to prevent and mitigate adverse impacts. Other provisions include establishing a helpdesk, combating climate change, and setting up a supervisory authority.

Penalties include fines of up to 5% of the net worldwide turnover. Companies are also liable for damages to individuals or legal entities. The directive entered into force on 25 July 2024. Member States must transpose it into their national law by 26 July 2026, and the measures shall apply from 26 July 2027.

## Regulation (EU) 2024/1834 implementing Directive 2009/125/EC on energy-related products (in force)

The European Commission published [Regulation \(EU\) 2024/1834](#) implementing Directive 2009/125/EC on energy-related products. The published regulation concerns eco-design requirements for fans driven by motors with an electric input power between 125 W and 500 kW and repeals Regulation (EU) No 327/2011, which currently covers such products.

Directive 2009/125/EC sets out the eco-design requirements to be met by energy-related products in order to be placed on the market and put into service. It aims to increase energy efficiency while ensuring an elevated level of environmental protection.

This Regulation (EU) 2024/1834 lays down eco-design requirements for the placing on the market or putting into service of fans with an electric input power between 125 W and 500 kW at their best efficiency point, including where they are integrated into other products. It further lists exemptions where the regulation does not apply as seen in Article 1 of the regulation. The eco-design requirements are set out in Annex II and shall apply from the respective dates stated according to Article 3.

Article 4 states the implementation of Directive 2009/125/EC concerning conformity assessment. The manufacturer, importer or authorized representative obligations are set out in Article 6 which includes, but are not limited to the following:

- » products that are designed to alter their behavior or properties when being tested to achieve a more favorable result for any declared value of the parameters of Regulation (EU) 2024/1834 cannot be placed on the market
- » manufacturers, importers, or authorized representatives cannot prescribe specific test instructions that alter the behavior or the properties of products to achieve a more favorable result for any declared values of the parameters regulated under Regulation (EU) 2024/1834.

Indicative benchmarks for the best-performing fans available on the market at the time of adopting Regulation (EU) 2024/1834 are set out in Annex V.

In addition, Regulation (EU) 2024/1834 will repeal Regulation (EU) No 327/2011 two years after its entry into force on 24 July 2024. However, Annexes I, II and III to Regulation (EU) No 327/2011 will continue to apply until 24 July 2037, in relation

to fans integrated into other products. Article 6 (Manufacturers Obligations) and Article 9(2) (Transitional Provisions) apply from 24 July 2024, which is the day of entry into force.

Penalties are not mentioned in the update.

## Addition of bis( $\alpha,\alpha$ -dimethylbenzyl) peroxide to the Candidate List of substances of very high concerns (effective)

The European Chemicals Agency (ECHA) [added bis\( \$\alpha,\alpha\$ -dimethylbenzyl\) peroxide](#) (EC No. 201-279-3; CAS No. 80-43-3) to the Candidate List of substances of very high concern (SVHC). The chemical is used as a processing aid, e.g., as a flame retardant. It was added as ECHA deems it toxic for reproduction.

Under REACH, companies have legal obligations when their substance is included – either on its own, in mixtures, or in articles – in the Candidate List. If an article contains a Candidate List substance above a concentration of 0.1 % (weight by weight [w/w]), suppliers have to update their safety data sheets (SDSs), give information on how to use it safely to downstream users and consumers, and notify the SCIP database<sup>1</sup> under the Waste Framework Directive.

Additionally, if the candidate list substance is present in an article above a concentration of 0.1% w/w and in quantities totaling over one tonne per producer or importer per year, then importers and producers have to notify ECHA of the presence of the substance within six months from the date it has been included in the list (i.e., from 27 June 2024).

## Update to the Restriction Roadmap under the Chemicals Strategy for Sustainability to detail substances subject to potential restrictions under REACH (in force)

The Restrictions Roadmap under the Chemicals Strategy for Sustainability has been [updated](#), detailing substances subject to potential restriction under REACH. The roadmap is divided into different pools based on the stage of the restriction process and the entities responsible for preparing restriction dossiers.

The roadmap includes “Pool 0” substances already in the Registry of Intentions (RoI) or those with a mandate provided to the European Chemicals Agency (ECHA) to prepare restriction dossiers. Notable substances include chromium VI compounds such as chromium trioxide (EC No. 215-607-8; CAS No. 1333-82-0), with a mandate for ECHA to develop a restriction dossier by 4 April 2024.

“Pool 1” contains substances under advanced consideration for restriction but not yet in the RoI. Key substances include:

- » 1,4-dioxane (EC No. 204-661-8; CAS No. 123-91-1) – planned restriction for its manufacture, placing on the market, and use in surfactants, with Annex XV submission in October 2025
- » Octocrylene (EC No. 228-250-8; CAS No. 6197-30-4) – restriction on mixtures containing this substance used as a UV filter, with submission planned for 10 January 2025

Other planned restrictions involve substances like polyvinyl chloride (PVC) and its additives, flame retardants, organophosphate flame retardants, ortho-phthalates, hydrocarbyl siloxanes, and bisphenols. The roadmap highlights the anticipated years for including these substances in the RoI and the preparatory work being conducted by ECHA, Member States, and the Commission.

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<sup>1</sup> Built by ECHA, SCIP is a database for storing safe-use information on substances of very high concern in articles as such or in complex objects (i.e., products).

The Rolling List of (groups of) substances for restriction updating Annex I to the Restrictions Roadmap under the Chemicals Strategy for Sustainability can be found [here](#).

## Opinion on priority chemicals for new or revised occupational exposure limit values (published)

On 31 May 2024, the Advisory Committee on Safety and Health at Work (ACSH) published its [opinion](#) on priority chemicals for new or revised occupational exposure limit values under European Union (EU) OSH (i.e., occupational safety and health) legislation. The opinion, adopted on 29 May 2024, underscores the importance of regular updates to these lists based on available knowledge to ensure worker safety and health.

The ACSH opinion includes one list of priority chemicals under the Chemical Agents Directive (CAD) 98/24/EC and a second list of priority chemicals under the Carcinogens, Mutagens and Reprotoxic Substances Directive (CMRD) 2004/37/EC. These lists update the previous ACSH opinion on priority chemicals for new or revised occupational exposure limit values under EU OSH legislation that was adopted on 26 May 2021.

The ACSH strongly recommends that the European Commission (EC) use these lists when selecting chemicals for developing legislative proposals for new or revised limit values under CAD and CMRD. The ACSH also requires the EC to consult the Working Party on Chemicals (WPC) when selecting immediate priority chemicals. The WPC will advise the EC on their immediate priority chemicals to be included in each European Chemicals Agency mandate from the lists presented in this opinion.

## Screening report to assess restriction on use of 1,2-dichloroethane in articles (published)

On 29 May 2024, the European Chemicals Agency (ECHA) published a [screening report](#) to assess the use of 1,2-dichloroethane (1,2-DCA; EC No. 203-458-1; CAS No. 107-06-2) in accordance with REACH Article 69(2). The report follows a consultation that was opened on 22 February 2022, inviting interested parties to express their views and concerns during the preparatory phase of the restriction proposal for 1,2-DCA. The uses of 1,2-DCA potentially relevant for its presence in articles include:

- » manufacturing of vinyl chloride monomer (VCM) for the production of polyvinyl chloride (PVC) and PVC articles.
- » use as a (transported) intermediate under strictly controlled conditions
- » use as a biocide for fumigating freight containers, potentially leaving temporary residues in fumigated articles

The screening report concluded that 1,2-DCA is a carcinogenic substance for which no safe threshold can be determined. There is evidence indicating that fumigating articles with 1,2-DCA can lead to human exposure. However, ECHA considers that this risk is addressed by other regulatory actions, such as the OSH Directive (89/391/EEC) and the Chemical Agents Directive (98/24/EC).

Therefore, under REACH Article 69(2), ECHA's view is that there is currently no need to prepare an Annex XV dossier for restriction. The information provided by Member States and industry associations during the call for evidence was incorporated into the final report.

Penalties are not mentioned in the update.

## Postponing the ban on perfluorooctanoic acid in fire-fighting foams (initiative)

The European Union (EU) has started an [initiative](#) that will postpone the ban on perfluorooctanoic acid (PFOA; CAS No. 335-67-1), its salts, and PFOA-related substances for use in fire-fighting foams. New concentration limits as unintentional trace contaminants will also be proposed. PFOA and its related compounds are generally prohibited in the EU under the REACH Regulation due to their persistence, bioaccumulation, and potential adverse health effects. However, certain exemptions have been allowed for specific uses, like fire-fighting foams, due to the absence of suitable alternatives.

This amendment will delay the enforcement of the ban on PFOA in fire-fighting foams, acknowledging the current reliance on these substances for effective fire suppression and the ongoing search for viable substitutes. Additionally, it will set new concentration limits for PFOA as unintentional trace contaminants, likely aligning with technical feasibility and safety considerations.

The amendment is expected to be adopted in the third quarter of 2024. A draft text will be published first, and a consultation opened for it.

## Amendment to the new F-Gas Regulation (EU) 2024/573 (draft)

The European Commission has released a [draft act](#) to amend the new F-Gas Regulation (EU) 2024/573. Comments were due on 11 July 2024. The new F-Gas Regulation (EU) 2024/573 entered into force on 11 March 2024 and aims to i) establish a binding European Union (EU) domestic reduction target for net greenhouse gas emissions (emissions after deduction of removals) of at least 55 % by 2030 compared to 1990 levels and ii) achieve climate neutrality within the EU at the latest by 2050.

The draft act includes additional and amended rules on registration requirements in the F-gas portal and is therefore important for the correct function of the portal. Those who may be required to register with the F-gas portal should be aware of the new registration requirements.

## Harmonized classification and labeling of bis(pentane-2,4-dionato)calcium (consultation)

On 10 June 2024, the European Chemicals Agency published an [update](#) regarding the harmonized classification and labeling (CLH) of bis(pentane-2,4-dionato)calcium (EC No. 243-001-3; CAS No. 19372-44-2). This substance is used in polymers and as a stabilizer in the manufacture of plastic products.

The update follows a proposal from Germany to harmonize the classification and labeling of this substance under the Classification, Labeling and Packaging (CLP) Regulation. The proposed classification is as follows:

- » Acute Tox. 4, H302
- » Eye Dam. 1, H318
- » Skin Sens. 1A, H317

Interested parties are encouraged to monitor the progress of this proposal throughout the CLH process, which includes the notification of intention and the adoption of the opinion by the Committee for Risk Assessment (RAC). This process enables stakeholders to prepare for and participate in the consultation phases. Stakeholders with pertinent information about the identity or hazard properties of the substance are invited to share this information with the dossier submitter early in the process.

The dossier will undergo an accordance check, and upon final submission, stakeholders will be informed of the consultation period's commencement. The RAC will subsequently adopt an opinion, which will be published along with any comments received and supporting documents.

## Classification, labeling, and packaging updates: three new intentions announced and three intentions withdrawn (announced)

The European Chemicals Agency announced three new intentions and withdrew three intentions since start of July regarding classification, labeling, and packaging (CLP) of certain substances.

### **New intentions**

- » [hexamethylene diacrylate](#) (EC No. 235-921-9; CAS No. 13048-33-4) is used in inks and toners, cooling liquids in refrigerators, oil-based electric heaters, binding agents in paints and coatings or adhesives. The proposed classification has not been announced yet.
- » [potassium bromate](#) (EC No. 231-829-8; CAS No. 7758-01-2) is used in laboratory chemicals, as an intermediate and as processing aid. The proposed classification is:
  - Ox. Sol. 1, H271
  - Acute Tox. 3, H301
  - Muta. 2, H341
  - Carc. 1B, H350
  - STOT SE 1, H370
- » [sodium bromate](#) (EC No. 232-160-4; CAS No. 7789-38-0) is used in pH regulators and water treatment products, formulation of mixtures and/or re-packaging, machine wash liquids/detergents, automotive care products, paints and coating or adhesives, fragrances and air fresheners. The proposed classification is:
  - Germ cell mutagenicity
  - Carcinogenicity
  - To be further specified

If these proposed classifications are approved, new labeling and packaging requirements might apply.

### **Intentions withdrawn**

The harmonized classification and labeling (CLH) intentions for [flumetralin](#) (EC No. 613-108-3; CAS No. 62924-70-3), [pyridazine-3,6-diol](#) (EC No. 204-619-9; CAS No. 123-33-1), and [terpineol](#) (EC No. 232-268-1; CAS No. 8000-41-7) were withdrawn on 4 July 2024. This means that no further actions will be taken on the CLP classification of these substances. If a new CLH intention is submitted for these substances, then the process will restart.

## Registry triphenylthiophosphate and tertiary butylated phenyl derivatives as substances of very high concern (notice)

The European Chemicals Agency's (ECHA) registry of substances of very high concern (SVHC) intentions until outcome aims to make interested parties aware of the substances for which an SVHC dossier is planned to be submitted to ECHA. Member States, or ECHA at the request of the European Commission, propose a substance to be identified as SVHC by

preparing a dossier in accordance with the requirements set out in Annex XV to REACH. Interested parties can follow the progress of a proposal through the SVHC identification process, from the notification of the intention until the outcome.

[Triphenylthiophosphate and tertiary butylated phenyl derivatives](#) (EC No. 421-820-9; CAS No. 192268-65-8) is under consideration as persistent, bio-accumulative, and toxic. The advance notice gives interested parties time to prepare for commenting later in the process. Interested parties with relevant information on the identity or hazard properties of the substance may submit such information during the upcoming consultation period.

## [Amendment to Regulation \(EU\) 2019/1021 on persistent organic pollutants to list dechlorane plus in Annex A with exemptions \(consultation\)](#)

The European Commission adopted a delegated act to [amend Regulation \(EU\) 2019/1021](#) on persistent organic pollutants (POPs), listing dechlorane plus in Annex A with specific exemptions, following the decision made at the eleventh meeting of the Conference of the Parties to the Stockholm Convention in May 2023. Dechlorane plus is used in complex supply chains, such as electronics and medical devices, necessitating time for stakeholders to find alternatives. The proposed EU restriction would ban the manufacturing, placing on the market, and use of dechlorane plus on its own, in mixtures or in articles. Comments were due on 24 July 2024.

A series of exemptions have been proposed, including:

- » an exemption for unintentional trace contaminants (Article 4 of the POPs regulation) applicable to concentrations of dechlorane plus equal to or below 1 milligram per kilograms (i.e., 0,0001 % by weight)
- » transitional exemptions for aerospace, space, and defense applications, medical imaging applications, radiotherapy devices and installations have been proposed until 26 February 2030, and until 31 December 2043 for spare parts for these same applications
- » articles containing dechlorane plus already in use may continue to be used after the exemption's expiry date

The regulation is proposed to apply from 26 February 2025. There are no penalties associated with this update.

## [Delegated act on to supplement criteria defining the conditions under which CO<sub>2</sub> is considered permanently chemically bound in a product \(consultation\)](#)

The European Commission (EC) introduced a [draft delegated act](#) under Directive 2003/87/EC to supplement criteria defining the conditions under which CO<sub>2</sub> is considered permanently chemically bound in a product, ensuring it does not re-enter the atmosphere during normal use or at the end of the product's life. It outlines the requirements for products to meet these criteria, such as being chemically bound through a controlled utilization process and remaining stable for several centuries. An annex, which lists products that qualify for the derogation from the obligation to surrender allowances, is included.

Additionally, the delegated act establishes a review procedure for updating the list of compliant products based on technological advancements and practical experiences. These regulations will impact industries involved in carbon capture and utilization, particularly those producing long-lived products like construction materials. Companies will need to ensure their processes and products comply with the new criteria to benefit from the allowance's exemption.

Comments were due on 16 July 2024. The EC plans to adopt the regulation in the third quarter of 2024. The initiative aims to ensure that captured CO<sub>2</sub> remains permanently bound in products, aligning with climate action goals. Penalties for non-compliance are not specified in this update.

This delegated act is part of the broader effort to align with the European Climate Law that targets a 55% reduction in net emissions by 2030 compared to 1990 levels. The new requirements aim to support the European Union EU Emission Trading System by exempting certain CO<sub>2</sub> emissions from the obligation to surrender allowances when they are permanently captured and utilized in products.

## France

### Draft texts regarding batteries, waste batteries, waste electrical and electronic equipment (consultation)

The French government has provided a number of draft texts adopted pursuant to European Union (EU) Regulation 2023/1542 with regards to batteries, battery waste, and waste electrical and electronic equipment (WEEE). The texts include a draft decree on the subject, as well as additional orders relevant to eco-organizations and the environmental code. Comments were due on 1 August 2024.

Regulation 2023/1542 on batteries and waste batteries aims to create a circular economy for the battery sector by targeting all stages of the battery life cycle, from design to waste treatment.

The draft texts aim to define the specifications for organizations and systems of the battery sectors, and the extended producer responsibility regarding waste in the sector. The text contains various provisions for adapting the recent EU regulations on batteries and associated waste into French law. The draft texts provide for the possibility for a reuse operator to be considered as a producer within the meaning of extended producer responsibility and ensures contractualization between battery waste managers and organizations or producers in an individual system.

There are no penalties associated with this update at this time.

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

## United Kingdom

### Proposals to introduce alternative transitional registration model (consultation)

The Department for Environment, Food and Rural Affairs (DEFRA) [extended the consultation on proposals](#) to introduce an alternative transitional registration model (ATRM) for United Kingdom (UK) REACH to 25 July 2024. The proposed ATRM is intended to reduce the estimated cost facing the UK's chemicals industry as it transitions from European Union to UK REACH. Key aspects of the proposed ATRM include:

- » proposal to significantly reduce the hazard information provided in registrations for transitional substances
- » proposal to enhance what information on “use and exposure” registrants in Great Britain need to provide in registrations
- » proposal for reduced hazard requirements in chemical safety reports carried out by all registrants of a transitional substance manufactured or imported in quantities of over ten tonnes per year

## Update to the Mandatory Classification and Labeling List to include eighty-eight substances (in force)

The Health and Safety Executive (HSE) has [updated the Great Britain Mandatory Classification and Labeling List \(GB MCL\)](#) to legally recognize [88 substances from the 14th and 15th Adaptations to Technical Progress \(ATPs\)](#) of the European Union (EU) Classification, Labeling, and Packaging (CLP) Regulation. This follows the non-retention of these substances in GB law at the end of the implementation period on 31 December 2020. The update aligns GB MCL with the EU harmonized classification and labeling adopted in 2017 and 2018, except for titanium dioxide (in powder form) and granulated copper, which have been removed for further assessment.

The GB MCL is the equivalent of the EU CLP list of hazard classifications, both aiming to ensure an elevated level of protection of human health and the environment as well as the free movement of substances, mixtures, and articles.

Duty holders are required to continue following the harmonized classification and labeling for the eighty-eight substances as there are no changes following this update. However, duty holders for titanium dioxide (in powder form) and granulated copper must self-classify under the GB CLP Regulation, pending further assessment by HSE. HSE will notify stakeholders through a CLP e-Bulletin once proposals for these two substances are published.

Penalties are not mentioned in the update.



## NORTH AMERICA

### [Canada](#)

#### Ministerial Condition No. 21762 regarding 1,3-cyclohexanedimethanamine, N,N-bis(2-methylpropylidene) (in force)

On 8 June 2024, the Canada Gazette announced [Ministerial Condition No. 21762](#) under the Canadian Environmental Protection Act, 1999 concerning the substance 1,3-cyclohexanedimethanamine, N,N-bis(2-methylpropylidene)- (CAS No. 173904-11-5). This Ministerial Condition is based on the assessment that the substance may be toxic or become toxic and specifies the conditions under which the substance can be manufactured or imported. The aim of this Ministerial Condition is to manage the manufacture and import of this substance to ensure it does not pose a risk to human health or the environment.

The notifier may manufacture or import the substance only if it is not used in consumer products governed by the Canada Consumer Product Safety Act unless it is chemically reacted into a stable matrix and cured during the manufacture of the consumer product. The notifier must transfer the substance only to persons agreeing to use it in accordance with these conditions. Before transferring the substance, the notifier must inform the recipient in writing about the conditions and obtain written confirmation from the recipient that they are aware of and will comply with the conditions.

The notifier must maintain records of the use of the substance, the quantities manufactured, imported, purchased, distributed, sold, and used, the names and addresses of recipients, and written confirmations from recipients. Records must be updated within 30 days of any changes and kept for at least five years in English, French, or both.

This Ministerial Condition came into force on 23 May 2024. Additionally, comments or objections regarding the equivalency agreement for greenhouse gas emissions in Saskatchewan were open until 60 days from 8 June 2024.

Penalties for non-compliance under CEPA include fines of up to \$1 million a day for each day an offence continues, imprisonment for up to three years or both.

## Order 2024-87-04-02 amending the Non-domestic Substances List (in force)

On 18 May 2024, the Canadian Minister of the Environment issued [Order 2024-87-04-02](#) amending the Non-domestic Substances List (NDSL) under the Canadian Environmental Protection Act, 1999. This amendment is part of an ongoing effort to manage chemical substances and ensure accurate regulatory lists. The Canadian Environmental Protection Act (CEPA), 1999, mandates the management and regulation of substances that could pose risks to human health and the environment. The NDSL and the Domestic Substances List (DSL) are key regulatory tools. Substances are regularly reviewed and updated on these lists to reflect their current use and status in Canada.

The Non-domestic Substances List (NDSL) includes substances that are not currently manufactured in or imported into Canada in significant quantities. Substances on the NDSL are subject to new substance notification requirements under CEPA 1999 before they can be manufactured or imported in Canada. The NDSL is regularly updated to reflect changes in the use and regulatory status of substances.

Order 2024-87-04-02 amends the NDSL by deleting three substances:

- » octadecylmethylsiloxane, dimethylsiloxane copolymer (CAS No. 67762-83-8)
- » utanoic acid, b 3-oxo-, 2-[(2-methyl-1-oxo-2-propen-1-yl)oxy]ethyl ester, polymer with butyl 2-methyl-2-propenoate, butyl 2-propenoate, ethenylbenzene and 2-methyl-2-propenoic acid, reaction products with ammonium hydroxide, ammonium salts (CAS No. 167208-61-9)
- » oxirane, 2-phenyl-, polymer with oxirane, mono(dihydrogen phosphate), decyl ether (CAS No. 308336-53-0)

These substances have been transferred to the Domestic Substances List (DSL), reflecting their increased use and acceptance within Canada. This transfer means that companies dealing with these substances must now comply with the regulatory requirements associated with the DSL. The update aligns with ongoing efforts to manage chemical substances accurately and ensure that regulatory lists reflect current usage patterns.

The Order comes into force simultaneously with [Order 2024-87-04-01](#), which amends the Domestic Substances List. There are no penalties associated with this update, but companies must stay informed about the current status of substances to ensure compliance with Canadian environmental regulations.

## Amendments to the Products Containing Mercury Regulations (published)

The Canadian Environmental Protection Agency (CEPA) has published [amendments](#) to the Products Containing Mercury Regulations. The amendments will enter into force on the first anniversary of the publication of this amendment.

Canada's mercury regulation, primarily governed by CEPA and the Mercury Regulations, aims to minimize mercury emissions and limit its use in products. The regulations control the import, export, and manufacturing of mercury-containing products, enforce reporting requirements for mercury releases, and promote the safe management of mercury.

waste. The goal is to reduce environmental and human health risks associated with mercury exposure through strict controls and regulatory measures.

The amendment changes the content of the regulations, including changes to sections on manufacture or import, and sale or offer for sale. The rationale behind the amendments has been explained by CEPA, pointing to the development of additional viable alternatives that were not available at the time of the original regulations' publication, as well as the ongoing decline in the market of mercury-containing products in Canada.

Affected parties should consult the amendments to understand how their products and processes are affected, and ensure they are compliant with the amendments ahead of their entry into force. There are no penalties associated with this update.

## Bill requiring the Canadian government to address environmental racism becomes law (in force)

A Bill requiring the Canadian government to address environmental racism has now received Royal Assent and become law. This [Bill](#) was introduced in 2022 and approved by Parliament in early June 2024. The legislation (C-226) gives the government two years to develop a national strategy to promote environmental justice and better understand the interplay between race, socio-economic factors, and environmental risk. The upcoming strategy will outline possible amendments to existing laws, policies and programs, opening the door to potential changes to how the government prioritizes, assesses, and manages the risk of high-concern chemicals.

A draft framework for a right to a healthy environment is expected soon.

## United States

### Updates to the Occupational Safety and Health Administration Hazard Communication Standard (published)

The Occupational Safety and Health Administration (OSHA) is [updating the Hazard Communication Standard](#) (HCS) to align with the Revision 7 of the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS). This update is aimed at resolving issues encountered during the 2012 HCS update and ensuring better compatibility with other U.S. agencies and global trade partners while simultaneously enhancing the standard's effectiveness.

OSHA believes these updates will improve the HCS's effectiveness by ensuring employees are fully informed about the chemical hazards they may encounter, thus reducing the occurrence of chemical-related workplace illnesses and injuries. Changes to the standard include:

- » updates to the criteria for classifying certain health and physical hazards
- » revised guidelines for updating labels, including provisions addressing the labeling of small containers and the relabeling of chemicals that have been released for shipment
- » new labeling rules for small containers to address issues such as insufficient space and readability
- » new trade secret-related provisions allowing for the use of concentration ranges when claiming trade secrets
- » technical changes related to the contents of safety data sheets to improve clarity and completeness
- » revisions to definitions of terms used in the standard

While penalties for non-compliance with OSHA standards generally exist, this update specifies that no employer shall be subject to penalty for failing to comply with a collection of information if it does not display a currently valid Office of Management and Budget control number (44 U.S.C. 3512).

Penalties for serious, other-than-serious, failure to abate, and posting requirements violations can be up to \$16,131 per violation, while willful and repeated violations can be up to \$161,323 per violation.

## Addition of seven per- and polyfluoroalkyl substances to the Toxics Release Inventory reporting requirements (effective)

The Environmental Protection Agency (EPA) has [updated the list of chemicals](#) that require reporting due to their toxic nature. This update is mandated by the Emergency Planning and Community Right-to-Know Act (EPCRA) and the Pollution Prevention Act (PPA) and is directed by the National Defense Authorization Act for Fiscal Year 2020 (FY2020 NDAA). This action, effective 17 June 2024, codifies the addition of seven per- and polyfluoroalkyl substances (PFAS) to the Toxics Release Inventory (TRI). The TRI reporting requirements are updated to ensure these PFAS are reported starting with the 2024 reporting year (reports due 1 July 2025). The effective date for the addition of these PFAS to the TRI is 1 January 2024. The new additions to the list are:

- » perfluorohexanoic acid (PFHxA; CAS No. 307-24-4)
- » perfluoropropanoic acid (PFPrA; CAS No. 422-64-0)
- » sodium perfluorohexanoate (CAS No. 2923-26-4)
- » ammonium perfluorohexanoate (CAS No. 21615-47-4)
- » 1,1,1-trifluoro-N-[(trifluoromethyl)sulfonyl] methanesulfonamide (TFSI; CAS No. 82113-65-3)
- » lithium bis[(trifluoromethyl)sulfonyl] azanide (CAS No. 90076-65-6)
- » betaines, dimethyl(.gamma.-.omega.-perfluoro-.gamma.-hydro-C8-18-alkyl) (CAS No.2816091-53-7)

The addition of these PFAS to the TRI is in compliance with the FY2020 NDAA, which mandates their inclusion based on specific triggering actions such as final toxicity values and declassification of confidential business information. Facilities that manufacture, process, or otherwise use any of the listed PFAS must adhere to the reporting requirements under EPCRA section 313 and PPA section 6607. The seven newly added PFAS are subject to the same reporting requirements as other chemicals of special concern, including exclusion from certain burden-reduction reporting options (e.g., the de minimis exemption).

Penalties are not mentioned in the update.

## Proposed rule restricting the use of n-methylpyrrolidone (draft)

On 5 June 2024, the U.S. Environmental Protection Agency (EPA) [announced](#) a [proposed rule](#) under the Toxic Substances Control Act (TSCA) aimed at protecting workers and consumers from exposure to n-methylpyrrolidone (NMP; CAS No. 872-50-4). The proposed rule aims to address identified health risks linked the widespread use of NMP, which is produced domestically and imported, in industries ranging from electronics and polymers to consumer products like paints, adhesives, and cleaning agents. This proposal follows a 2020 risk evaluation that found NMP causes severe health issues, including reproductive harm and organ damage. The rule aims to regulate NMP concentrations in various products, introduce stringent workplace controls, and ban certain unsafe uses.

The proposed rule includes:

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- » consumer protection:
  - NMP concentration limit of no more than 45% in glues and adhesives
  - container size limits and labeling requirements to ensure safer use
- » Workplace health controls:
  - establishment of a workplace chemical protection program for industrial and commercial use
  - requirements to prevent direct skin contact with NMP, are to be implemented one year after finalization
  - use of existing exposure controls, such as enclosed tools and clean rooms, in semiconductor and lithium-ion battery manufacturing
  - specific concentration limits and personal protective equipment requirements for other uses (e.g., paints, adhesives, inks, coatings)
- » commercial bans
  - prohibition of NMP in automotive care products, cleaning and degreasing products, and furniture care products due to safety concerns
  - bans on antifreeze, de-icing products, and lubricants, as their use has reportedly ceased
  - ban on NMP in fertilizers and agricultural chemical manufacturing pending further information

The public on the proposal were due on 29 July 2024, 45 days after its publication in the Federal Register.

## Significant New Use Rules for sixty-five substances (proposed)

The United States Environmental Protection Agency (EPA) has proposed two batches of significant new use rules (SNURs) under the Toxic Substances Control Act (TSCA) for sixty-five substances. These proposals address a backlog of approximately 350 chemicals recently approved under the TSCA Section 5 new chemicals program.

The proposed SNURs cover two groups including one for 34 substances ([22-4.5e](#)) and another for 31 substances ([23-3.5e](#)). These rules require manufacturers or processors to notify EPA at least 90 days before commencing any activity identified as a significant new use for these substances. This notification allows EPA to evaluate the conditions of use and make determinations to ensure compliance. The manufacture or processing of these substances for significant new use cannot begin until EPA's review and determination are complete. This regulation aims to ensure that any new uses of these chemicals are assessed for potential risks to health and the environment before they occur.

There are no specific penalties associated with this update.

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