Newsletter

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

IAEG

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NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 10 – 2025

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 Michele Lawrie-Munro at mlawriemunro@iaeg.com.

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GLOBAL

Minamata Convention and Montreal Protocol ratifications (published)

The United Nations Environment Program has announced the ratification of the Minamata Convention by Israel on 26 September 2025 and the Kigali Amendment to the Montreal Protocol by Brunei Darussalam on 18 September 2025 and Saudi Arabia on 10 September 2025.

Revision 11 of the Globally Harmonized System of Classification and Labeling of Chemicals (published)

The United Nations Economic Commission for Europe published the biennial revision of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). This version incorporates amendments to Revision 10 as well as a few significant changes. GHS is a standardized system for classification of hazards from chemicals and communication of these through labels and Safety Data Sheets. It aims to enhance protection of human health and the environment by ensuring that hazard information is consistent, understandable, and available across different countries and industries, while facilitating trade.

As in the previous revision, Revision 10 published in 2023, there are four major Chapters (Introduction, Physical Hazards, Health, Hazards, and Environmental Hazards) and eleven Annexes. Chapter 2.3 contains provisions that clarify the classification criteria for aerosols and chemicals under pressure. Chapter 2.17 has clarifications to the classification guidance for desensitized explosives. Chapter 3.4 provides new guidance for classification of skin sensitization based on non-animal testing methods. Chapter 4.2 has been renamed from "Hazardous to the ozone layer" to "Hazardous to the atmospheric system" and now covers both global warming and ozone depletion. A new hazard class, "Hazardous by contributing to global warming," has been introduced along with classification criteria and label elements.

In Annex 3, the precautionary statements have been updated to improve user comprehensibility. Annex 11 has new guidance on the identification and classification of hazards for simple asphyxiants.

There are no penalties associated with this update.

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ASIA

China

Regulatory updates regarding use of hydrochlorofluorocarbons (consultation)

The General Office of the Ministry of Ecology and Environment has issued a public consultation letter seeking feedback on two separate draft announcements. These proposed regulatory updates are designed to effectively implement the Montreal Protocol on Substances that Deplete the Ozone Layer by introducing:

- a prohibition on the production of extruded polystyrene foam products (can also be found here in Chinese) using hydrochlorofluorocarbons (HCFCs) as foaming agents
- a prohibition on the use of HCFCs as cleaning agents (can also be found here in Chinese).

Comments were due on 17 October 2025. More information can be found here in Chinese.

Japan

Correction to Japan's Integrated Global Harmonized System classification results for 4-vinylcyclohex-1-ene (published)

Japan's National Institute of Technology and Evaluation submitted a correction to its Integrated GHS Classification[1] Results for the substance 4-vinylcyclohex-1-ene (CAS No. 100-40-3). This substance is a flammable liquid used in plastic, flame retardant, and paint. On 29 September 2025 its status was changed from hazard level Category 3, signal word "Warning", hazard statement H226 to hazard level Category 2, signal word "Danger", hazard statement H225.

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

Guidelines for reporting hazardous substances pursuant to Article 41 of the Chemical Substances Control Law (published)

In September 2025, Japan published guidelines for reporting hazardous substances (can be found here in Japanese) pursuant to Article 41 of the Chemicals Substances Control Law (CSCL). The guidelines explain Article 41 duty to report newly obtained harmful information on chemicals within 60 days to the Ministers of Health, Labor, and Welfare, Economy Trade and Industry (METI), and the Environment.

The guidelines clarify the scope and forms. Mandatory reports use Form No. 1 for "priority assessment chemicals", "monitoring chemicals", "Class II specified chemicals", and "general chemical substances" under Article 41, Paragraph 1. Form No. 1 also applies under Article 41 paragraph 2 for "small quantity new chemical substances", "polymers of low

[1] GHS classification is the process of categorizing a chemical's hazards based on the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals.

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concern", "low production volume new chemical substances", and "post review pre-publication new chemical substances". Effort obligation cases under Article 41 paragraph 3 use Form No. 2 for "priority assessment chemicals", "monitoring chemicals", and "Class II specified chemicals". Voluntary reporting for other substances uses a Reference Form.

A complete filing consists of a "harmful information report," supporting materials that show the harmful information, and the test report. Three identical sets must be prepared per substance and addressed to all three ministers. The manual recommends a mixed format with the report form on paper and items two and three on optical disc and provides file naming conventions. Items two and three may be omitted in limited cases such as where findings were prepared for a new substance notification, data were submitted under the Industrial Safety and Health Act, or data formed part of an approval application for a pharmaceutical or medical device.

Reportable information covers human health and environmental endpoints including biodegradability, bioaccumulation, partition coefficient, repeated dose and chronic toxicity, reproductive and developmental toxicity, mutagenicity, carcinogenicity, toxicokinetics, and key aquatic tests. Results from facilities that do not follow good laboratory practices (i.e., GLP) are also in scope. Reported information is shared with the National Institute of Technology and Evaluation and used only for chemical substance control policy.

Required data fields include the classification of the target chemical substance, the Official Gazette publication reference number if assigned, and the CAS number if assigned. Submissions may be made by post or in person to the METI Chemical Management Division, with the package addressed to the three ministers.

Penalties are not mentioned in the update.

Industrial Safety and Health Act newly announced chemical substances (published)

On 26 September 2025, Japan's Ministry of Health, Labor, and Welfare published 149 entries on the "name publicly announced" list for new chemical substances under the Industrial Safety and Health Act (ISHA). The listing provides serial numbers, substance names, and, for many entries, structural formulas. This publication is part of routine ISHA administration that formally name-publishes these substances. Once name-published, each substance is treated as existing for ISHA purposes and other manufacturers and importers do not need to submit a new-substance notification before manufacture or import.

More information can be found here in Japanese.

Amendment to the chemical regulatory framework regarding perfluorohexane sulfonic acid-related substances pursuant to the Stockholm Convention (consultation)

Following the Stockholm Convention's decision to designate perfluorohexane sulfonic acid-related substances as eliminated substances, the Ministries of Health, Labor, and Welfare, Economy, Trade, and Industry, and the Environment (the "three ministries") proposed amendments to Japan's chemical regulatory framework. These include adding PFHxS-related substances to the first-class specified chemical substances under the Chemical Substances Control Law. The draft also removes previously permitted exceptional uses of 8:2 fluorotelomer alcohol (CAS No. 678-39-7), as these no longer meet the "difficult to substitute" requirement.

Newly added PFHxS-related substances will be prohibited from manufacture, import, and use, and products containing these substances may also face import restrictions or be required to comply with technical standards and labeling

obligations. In addition, related Ministerial Ordinances on technical standards for manufacturing facilities, handling, and container or packaging labeling have been amended to ensure alignment with the Cabinet Order.

More information can be found here in Japanese.

Designation of products containing chlorpyrifos, medium-chain chlorinated paraffins (MCCP), and long-chain perfluorocarboxylic acids and their salts and related substances as "Class I Specified Chemical Substances" (draft)

On 19 September 2025, a draft proposal (can also be found here in Japanese) was published outlining the necessary regulatory steps to designate chlorpyrifos (CAS No. 2921-88-2), medium-chain chlorinated paraffins (MCCP), and Long-chain perfluorocarboxylic acids (LC-PFCA) and their salts and related substances as "Class I Specified Chemical Substances" under Japan's Chemical Substances Control Law (CSCL). The fundamental aim of this amendment is to fulfill Japan's obligations under the Stockholm Convention on Persistent Organic Pollutants (POPs), which requires signatory nations to take measures to prohibit the manufacture, use, and import of POPs to protect human health and the environment.

Under the CSCL, chemical substances targeted for elimination or restriction by the Stockholm Convention are typically designated as "Class I Specified Chemical Substances," restricting their manufacturing and use due to their documented persistence, high bioaccumulation, and long-term toxicity to humans.

The proposed designation will result in a permit system for manufacture/import, prohibitions on use outside of designated essential applications (where applicable), and the prohibition of importing specific products containing these substances. The proposed regulatory measures concerning Chlorpyrifos, MCCP, and LC-PFCA and related substances are scheduled for implementation following several key consultation steps. Comments were due on 15 October 2025.

Penalties for non-compliance include the potential for the issuing authorities to issue mandatory orders for the recovery or other necessary measures concerning the chemical substances or products containing them to the manufacturer or importer, should it be deemed necessary to prevent the progression of environmental contamination.

More information can be found here in Japanese.

Request for the provision of toxicity information on sodium salt of α-hydro-ω-sulfoxy poly[oxy (methylethylene)] alkyl (C8–12) ether for hazard classification (draft)

On 17 October 2025, Japan's Ministry of Health, Labor, and Welfare, Ministry of Economy, Trade, and Industry (METI), and Ministry of the Environment announced a request (can also be found here in Japanese) for hazard data on sodium salt of α-hydro-ω-sulfoxy poly[oxy(methylethylene)] alkyl (C8–12) ether (CAS No. 2172642-87-2). This chemical was identified as a candidate for default hazard classification due to insufficient ecotoxicity data under Japan's Chemical Substances Control Law (CSCL). Businesses are asked to submit reliable acute or chronic toxicity data for algae, daphnia, and fish, or to propose testing by 30 November 2025. If no valid data or testing proposals are submitted, default hazard classifications (human health hazard class 2, ecological hazard class 1) will apply, and the substance may be designated as a Priority Assessment Chemical Substance.

Companies must submit test reports or testing proposals following CSCL procedures and forms specified in the "Guidelines on Reporting Hazard Information." Submissions must include three sets of documents (report form, supporting materials,

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and test report) by post or in person to METI. If testing is proposed, results must be provided promptly after completion. Substances lacking reliable data or proposals will be subject to default classification and further assessment under Article 10 of CSCL, potentially requiring submission of toxicity data by manufacturers or importers.

Philippines

Chemical Control Order for benzene and benzene-containing mixtures (draft)

The Department of Environment and Natural Resources issued a draft Chemical Control Order (CCO) that establishes controls for benzene and benzene-containing mixtures across import, manufacture, processing, handling, storage, transport, sale, distribution, use, and disposal. It defines the scope to cover importers, distributors, manufacturers, industrial users and commercial users, and sets exemptions where other Philippine laws or agencies regulate the use, including fuels under the Department of Energy, products under the Food and Drug Administration, agricultural uses under the Department of Agriculture, and substances in articles or naturally occurring as defined in EMB MC 2020-005.

Allowed applications include manufacture of benzene, use for chemical synthesis, use in motor fuel, laboratory analytical or research work, and other industrial or commercial uses where benzene content is equal to or less than one percent by volume. Prohibited applications, unless no technically and economically feasible alternatives exist and a specific exemption is granted, include use in paints and coatings, glues and rubber goods, textile and leather solutions, inks and dyes, cleaning and degreasing agents, and toys and children's products.

The CCO would require applicants to secure registration and permits via the CCO Registration module in the Online Permitting and Monitoring System (OPMS), documentary requirements including a chemical management plan, contingency and emergency plan, substitution and phase-out plan where applicable, GHS-compliant safety data sheet, process flow, training certificates and other evidence. It further establishes handling, storage, labelling, manufacturing and usage controls, waste management obligations, training, import clearance procedures, and validity and renewal rules.

Violations are subject to administrative and criminal sanctions under RA 6969, DENR AO 1992-29, and DENR MC 2005-003. The CCO also provides for impoundment or confiscation in cases of non-compliance.

Saudi Arabia

Implementing Regulations of the Chemical Materials Management System (in force)

On 29 August 2025, Saudi Arabia published the Implementing Regulations that puts into effect its Chemical Materials Management System. The regulations define the scope and responsibilities, identify competent authorities, and set out controls across the chemical's lifecycle. They exclude specified categories such as medicines, household chemicals defined in the by-law, and chemicals imported directly by the armed forces for military purposes.

The framework establishes nine detailed lists of controlled chemicals. These include national lists for explosive precursors (List 1) and drug precursors (Lists 2 and 3), which include defined entries and, where applicable, specified thresholds. The lists also integrate Saudi Arabia's obligations under international conventions as follows: List 4 covers the Rotterdam and Minamata Conventions, List 5 covers the Stockholm Convention, List 6 covers the Montreal Protocol, and List 7 aligns with the Chemical Weapons Convention. Lists 8 and 9 address civilian explosives and other chemicals not otherwise restricted internationally.

Permitting and clearances are handled by the relevant competent authorities, which can involve multiple ministries depending on the chemical and its intended use.

Operational provisions require:

- obtaining permits before import, export, or re-export
- transporting released imports within three working days
- notifying the Ministry of Interior before moving hazardous chemicals
- storing chemicals only in designated and compliant facilities
- using qualified personnel
- maintaining Safety Data Sheets that, for import and export processes, are not older than three years

Customs authorities are tasked with clearance procedures and reporting violations. Transport by air must comply with Civil Aviation Authority rules, and all operators must adhere to applicable national and international standards, including instructions from the Industrial Security Authority where relevant.

Penalties for non-compliance may be applied cumulatively, including fines of up to SAR 1,000,000, imprisonment for up to five years, a ban on related business activities for up to five years, an order to remedy the violation, the return or destruction of non-compliant chemicals at the violator's expense, and publication of the court's decision after the judgment is final.

More information can be found in Arabic here on the implementing regulation and the approval of the amendment to the first, second, and third lists of security-restricted chemicals.

Vietnam

Lists of chemicals subject to management under the Law on Chemicals No. 69/2025/QH15 (draft)

On 2 October 2025, Vietnam issued a notification via the World Trade Organization (WTO) that would establish five annexed lists of chemicals subject to management under Law on Chemicals No. 69/2025/QH15. The draft Decree (can also be found here in Vietnamese) would apply to domestic and foreign organizations and individuals conducting activities related to chemicals in the territory of Vietnam. The consultation period on the draft Decree runs until 16 November 2025.

Annexes:

- Annex I: List of basic chemicals in prioritized chemical industry sectors
- Annex II: List of chemicals subject to conditional production and trading
- Annex III: List of chemicals subject to special control in production and trading
- Annex IV: List of chemicals required to prepare a Chemical Accident Prevention and Response Plan
- Annex V: List of training disciplines eligible to conduct chemical safety activities

On adoption, these lists will function as operative catalogs that trigger obligations under the Law on Chemicals and its implementing measures. The draft text indicates the decree will replace Decree 113/2017/ND-CP and its subsequent amendment on entry into force. Stakeholders should note a timing discrepancy: the WTO notice proposes 1 July 2026 for entry into force, while the Vietnamese draft text currently states 1 January 2026. The finalized decree is expected to resolve this discrepancy.

EUROPE

European Union

Exemption extensions for the use of lead (amendment)

The European Commission adopted three Commission delegated directives that amend Annex III of the RoHS Directive[2] to extend exemptions for the use of lead as an alloying element in steel, aluminum and copper; in high melting temperature type solders; and in glass or in ceramic of electrical or electronic components, including dielectric ceramic in capacitors. These exemptions adapt to scientific and technical progress for specific applications of lead where its elimination is considered scientifically or technically impracticable, or where the reliability of substitutes is not ensured.

The directives replace the entries in Annex III of the RoHS Directive. However, the exemption categories have been split into numerous sub-categories reflecting specific applications, each with corresponding updated exemption expiry dates. Each of the three directives is accompanied by an annex which shows these updated categories and dates. The directives must be applied by member states six months and one day after they have come into force. There are no penalties associated with this update.

Addition of dechlorane plus, including its syn- and anti-isomers to Part A of Annex I of the Persistent Organic Pollutants Regulations (published)

On 25 September 2025, the European Commission published Commission Delegated Regulation (EU) 2025/1930, which adds dechlorane plus, including its syn- and anti-isomers (EC No. 236-948-9; CAS Nos. 13560-89-9, 135821-03-3, and 135821-74-8), to Part A of Annex I of the Persistent Organic Pollutants (POPs) Regulation. The listing triggers a general prohibition on manufacture, placing on the market and use in substances, mixtures, and articles unless a specific exemption applies.

The entry sets unintentional trace contaminant limits of up to 1,000 milligrams per kilogram (mg/kg) in substances, mixtures, or articles until 15 April 2028, and up to 1 mg/kg thereafter, to ensure uniform and adequate application of analytical methods. Temporary exemptions apply to aerospace, space, and defense applications, medical imaging applications, and radiotherapy devices and installations until 26 February 2030. Further derogations allow placing on the market and use of spare parts containing dechlorane plus, where it was initially used, for specified sectors including aerospace, space and defense, land based motor vehicles, certain industrial machines, marine and outdoor power equipment, and instruments, until the end of service life or 31 December 2043, whichever occurs first. Articles already in use in the European Union (EU) before or on the date of expiry of the relevant exemption may continue to be used, and spare parts for aerospace, space, and defense that are present in the EU before or on 31 December 2043 may continue to be placed on the market and used after that date.

[2] The RoHS Directive is a European Union law that restricts the use of certain hazardous substances in electrical and electronic equipment to protect human health and the environment

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This amendment implements the decision taken under the Stockholm Convention to list dechlorane plus, thereby aligning EU law with global POPs controls. The Stockholm Convention is a global treaty that aims to protect human health and the environment from persistent organic pollutants by eliminating or restricting their production, use, import, and export.

Penalties are not mentioned in the update.

Amendment to Annex XVII to EU REACH regarding per- and polyfluoroalkyl substances in firefighting foams (adopted)

On 23 October 2025, the European Commission issued an amendment to Annex XVII of Regulation (EC) No 1907/2006 (EU REACH) to add a restriction on the use of per- and polyfluoroalkyl substances (PFAS) in firefighting foams. It covers the whole PFAS class, instead of specific sub-groups, to avoid "regrettable substitution" in the future. PFAS meet the persistence criteria in Point 1.2.1 of annex XIII of EU REACH. The restriction should be applied Union-wide. The amendment contains an Annex structured as a new restriction entry (Number 82) to Annex XVII of EU REACH.

Starting from 23 October 2030, there will be a ban on the use and placing on the market of firefighting foams with a concentration of 1 milligram per liter (mg/L) or greater for the sum of all PFAS (restricted PFAS-containing firefighting foams). This restriction will be subject to transitional periods and exceptions on a sector-specific basis. Some PFAS sub-groups, specified in the restriction entry, are excluded if they are already subject to restrictions or prohibitions under EU REACH. However, they will be included in the determination of concentration for the sum of all PFAS in this restriction. These include perfluorooctane sulfonate (PFOS; CAS No. 1763-23-1), perfluorooctanoid acid (PFOA; CAS No. 335-67-1), perfluorohexanoic acid (PFHxA; CAS No. 307-24-4), their salts, and related compounds as well as C9-C14 perfluoroalkyl carboxylic acids (PFCAs).

Different exceptions apply to "use" and "placing on the market." For placing on the market, as defined in EU REACH, and applicable to manufacturers, importers, distributors, and retailers. Exceptions to the general transitional period depend on the urgency and difficulty of switching to alternatives. Restricted PFAS-containing firefighting foams may be placed on the market until the respective dates stated as follows, according to specific products:

- 23 October 2026 in firefighting foams in portable fire extinguishers
- 23 April 2027 in alcohol-resistant firefighting foams in portable fire extinguishers
- 23 October 2035 in firefighting foams for:
  - establishments covered by Directive 2012/18/EU, except for civilian aviation and airports
  - installations belonging to the offshore oil and gas industry
  - military vessels
  - civilian ships with firefighting foams placed on board before 23 October 2025

However, according to Article 3(24) of EU REACH, the definition of "use" covers formulation, processing, and storage, irrespective of the destination of the PFAS-containing firefighting foams. Some of the restrictions for "use," coming into effect on 23 October 2026, may be of interest to those not directly involved in putting out fires:

- reduce emissions to the environmental compartments, and direct/indirect human exposure
- ensure the separate collection of stock of not-utilized firefighting foams and PFAS-containing waste, including wastewater and ensure their handling for adequate treatment in such a way that the PFAS content is destroyed or irreversibly transformed
- establish a "PFAS-containing firefighting foams management plan" specific for the place of use of the firefighting foams containing PFAS, as detailed in the restriction, which should be kept for inspection for 15 years

Starting from 23 October 2026, labeling requirements apply for restricted PFAS-containing foams placed on the market, excluding portable fire extinguishers. These must be labelled as follows: "WARNING: Contains per- and polyfluoroalkyl substances (PFAS) with a concentration equal to or greater than 1 mg/L for the sum of all PFAS" in the language of the Member State where it is placed on the market, unless they have specified otherwise. This labeling requirement will also apply to users for unutilized firefighting foams and PFAS-containing waste, including wastewater, originating from the use of firefighting foams containing 1 mg/L or greater for the sum of all PFAS.

The restriction is effective on 23 October 2025, and labeling requirement is effective on 23 October 2026. Some restrictions will come into effect on 23 October 2026 and 23 April 2027. The general restriction on use and placing on the market will be effective on 23 October 2030. However, the last restriction deadline will not come into effect until 23 October 2035.

There are no penalties associated with this update.

Product Environmental Footprint Category Rules for the space sector (consultation)

The European Commission has released a draft of the Product Environmental Footprint Category Rules (PEFCR) specific to the space sector, with the consultation period open until 1 December 2025. The PEFCR aims to standardize how environmental impacts of space-related products are measured and communicated, aligning with the European Union's (EU's) broader sustainability and circular economy goals. The draft outlines methodological requirements for calculating the environmental footprint of space products, including life cycle assessment parameters, data quality criteria, and impact categories such as climate change, resource use, and toxicity.

Because this is a draft phase, no penalties are currently established. The framework is voluntary and intended to guide future standardization. Firms involved in the design, manufacture, or integration of space sector components, particularly those operating within or exporting to the EU, may wish to review the draft and consider submitting feedback during the consultation period.

Germany

Law to align German legislation with the European Union battery regulation (in force)

The Federal Law Gazette published the Law on the Adaptation of Battery Law to Regulation (EU) 2023/1542 (Batt-EU-AnpG) (can also be found here in German), aligning German legislation with the new European Union (EU) battery regulation focusing heavily on Extended Producer Responsibility (EPR) and market surveillance. This national law, which applies to batteries and waste batteries falling within the scope of the EU Regulation, simultaneously repeals the previous German Battery Act of 25 June 2009, which is set to expire on 6 October 2025.

The Regulation does not apply to the batteries described in Article 1(5) and (6) of Regulation (EU) 2023/1542, which covers batteries incorporated into or specifically designed for military equipment related to essential security interests, excluding non-military products, or for equipment intended for space use. The law is divided into seven main parts, covering the entire lifecycle of batteries and associated regulatory duties. The structure includes:

- Part 1 on general provisions (including purpose, scope, and traffic bans)
- Part 2 on the management of used batteries (covering sales, take-back, treatment, and notification obligations)
- Part 3 addressing the competent authority under Chapter VIII of Regulation (EU) 2023/1542
- Part 4 dedicated to conformity assessment and notification procedures

- Part 5 covering due diligence obligations in the supply chain
- Part 6 covering authorization to issue legal regulations
- Part 7 dealing with fines and final provisions

The law provides an Annex which details the fee schedule. This schedule outlines various fees associated with the administrative activities required by the law.

Penalties for non-compliance include fines. The administrative offence provisions stipulate fines of up to five hundred thousand euros for severe violations, such as certain breaches of due diligence obligations.

Ireland

Amendments to Waste Electrical and Electronic Equipment Regulations 2014 (published)

The Ministry for Climate, Energy, and the Environment published Regulation S.I. No. 427/2025 that amends the Waste Electrical and Electronic Equipment (WEEE) Regulations 2014 to ensure producers finance the environmentally sound management of electrical and electronic equipment (EEE), including private household and non-household waste, photovoltaic panels, and open scope EEE. The amendments reflect changes in market share responsibilities, obligations for distributors, and compliance with EU Directive 2024/884.

Producers are required to finance the collection, recovery, and environmentally sound disposal of EEE based on the date the products were placed on the market and the type of equipment. For new market placements, producers must provide a financial guarantee monthly to ensure these obligations are met. Distributors are also required to inform purchasers about the producer responsible for end-of-life management of the equipment. Specific obligations apply to photovoltaic panels and open scope EEE, with rules applying to products placed on the market from 2012 and 2018, respectively. Additionally, Schedule 13 of the regulations has been updated to reference European Standard EN 50419:2022.

Penalties for non-compliance have not been stated in the amendment.

Review of the Waste Electrical and Electronic Equipment and Batteries Producer Responsibility Schemes (consultation)

On 29 September, Ireland published a consultation to gather views on the review of the Waste Electrical and Electronic Equipment (WEEE) and Batteries Producer Responsibility Schemes. Ireland uses an extended producer responsibility (EPR) scheme for multiple waste streams, where producers are responsible for financing the collection and environmentally sound waste management for products at end of life. This consultation seeks stakeholder input on the experiences and outcomes of having competition in the compliance sector. Comments are due on 24 November 2025.

The minimum requirements for an EPR scheme as set out in Article 8a of the European Union Waste Framework Directive (WFD), have been transposed into Irish law by S.I. No. 126/2011. Currently, any entity may apply to fulfill compliance obligations for members as a Producer Responsibility Organization (PRO), subject to ministerial approval. Unlike other waste streams, for the WEEE and batteries sectors, two PROs have operated compliance schemes since 2005: ERP Ireland and WEE Ireland.

Submissions may be based on the survey questions provided in the consultation document. The comments collected will be used as part of a review to evaluate whether the current operating model is functioning effectively in meeting targets, regulatory conditions, and financial requirements, while ensuring quality compliance, promoting competition and circularity, contributing to national policy, and supporting Ireland's transition to a circular economy.

United Kingdom

Mandatory classification and labeling for 30 substances (in force)

On 23 September 2025, ministers acting on behalf of the Secretary of State, with the consent of Scottish and Welsh Ministers, made a decision on the Great Britian mandatory classification and labeling (GB MCL) for 30 substances. This ministerial decision is an administrative step to update the legally binding GB MCL list with new and revised classifications. Summaries of the decisions have been added to Health and Safety Executive GB classification, labeling, and packaging publication table, and the GB MCL list itself has been updated accordingly. The decision reflects the identification of intrinsic hazards based on scientific and technical assessment, with no significant impacts identified by the impact and policy assessments.

Penalties are not mentioned in the update.

NORTH AMERICA

Canada

Three Ministerial Conditions to allow manufacture or import of three substances only under specific conditions (published)

On 13 September 2025, the Department of the Environment (Canada) issued three distinct Ministerial Conditions (Nos. 22270, 22274, and 22269) pursuant to Paragraph 84(1)(a) of Canada Environmental Protection Act, 1999 (CEPA). The Ministers of the Environment and Health have allowed the manufacture or import of three substances, but only under specific conditions, because they suspect these substances could be harmful to human health or the environment (as defined in section 64 of CEPA):

- butanoic acid,4-[[(1R)-2-[5-(2-fluoro-3-methoxyphenyl)-3-[[2-fluoro-6-(trifluoromethyl)phenyl] methyl]-3,6-dihydro-4-methyl-2,6-dioxo-1(2H)-pyrimidinyl]-1-phenylethyl]amino]-, sodium salt (1:1) (Ministerial Condition No.22269) (CAS No. 832720-36-2)
- 1-pyrrolidinecarboxamide,3-ethyl-4-(3H-imidazo[1,2-a]pyrrolo[2,3-e]pyrazin-8-yl)-N-(2,2,2-trifluoroethyl)-, (3S,4R)- (Ministerial Condition No.22270) (CAS No. 1310726-60-3)
- spiro[6H-cyclopenta[b]pyridine-6,3'-[3H]pyrrolo[2,3-b]pyridine]-3-carboxamide,1',2',5,7-tetrahydro-N-[(3S,5S,6R)-6-methyl-2-oxo-5-phenyl-1-(2, 2,2-trifluoroethyl)-3-piperidinyl]-2'-oxo-, (3'S)- (Ministerial Condition No.22274) (CAS No. 1374248-77-7)

Regulatory requirements include providing detailed notification 120 days prior to manufacturing the substance in Canada, adherence to environmental release protocols, obtaining written confirmation from transferees, and maintaining records for a period of at least five years.

The conditions came into force on 4 September 2025. There are no penalties associated with this update, but non-compliance may be subject to enforcement under CEPA.

Amendments to the Non-domestic Substances List (effective)

The Canadian Environmental Protection Agency, under the Canadian Environmental Protection Act (CEPA), has amended the Non-domestic Substances List (NDSL). The amendments, published on 6 September 2025 and 20 September respectively, introduce and remove several entries. The NDSL is a list of substances that are not used commercially in Canada above certain threshold quantities specified in the New Substances Notification Regulations, but that are known to be in international commerce. Substances listed under the NDSL are subject to notification requirements and other requirements under the New Substances Notification Regulations. Chemicals on the NDSL are subject to fewer information requirements in comparison to new chemicals not on the NDSL.

Update 1 (Order 2025-87-04-02, Order 2025-87-06-02, Order 2025-87-07-02) includes amendments to:

- Part II of the NDSL by adding alkanediol, polymer with substituted- (substitutedalkyl)-trialkylcarbomonocycle, and N-[(3-trimethoxysilyl)propyl]carbamate (CAS No 19739-7)
- Part I of the NDSL by deleting the following substances
  - phthalic anhydride, diethylene glycol, glycerol polyester (CAS No. 27026-61-5)
  - 2-ethylhexyl hydrogen -2-ethylhexylphosphonate (CAS No. 14802-03-0)
  - 2-Propenoicacid,2-methyl ,butylester,polymerwithdiethenylbenzene,ethenylbenzene, ethenylethylbenzeneandmethyl2-methyl-2-propenoate (CAS No. 1204391-75-2)
  - dipotassium octyl phosphate (CAS No. 19045-79-5)
  - cellulose, regenerated (CAS No. 68442-85-3)

Update 2 includes amendments to the NDSL through:

- Order 2025-66-01-02, which deletes three substances from Part and adding numerous substances to Part I and two new substances to Part II
- Order 2025-87-09-02 deleting substance Octadecyl acrylate resin (CAS No. 25986-77-0) from Part I

The amendment entered into force on various dates in September, from which the entries removed from the NDSL no longer carry the associated obligations. There are no penalties specified in these updates.

United States

Reconsidering the 2024 final risk management rule for carbon tetrachloride (published)

The United States Environmental Protection Agency (EPA) is reconsidering the 2024 final risk management rule for carbon tetrachloride (CTC) following legal challenges consolidated in the U.S. Court of Appeals for the Eighth Circuit. EPA has requested that the court pause these cases while it re-evaluates the rule through notice-and-comment rulemaking.

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The reconsideration will focus on ensuring the rule is implementable to protect workers, including consideration of the Existing Chemical Exposure Limit of 0.03 parts per million established under the Workplace Chemical Protection Program for CTC. Additional changes may be proposed as part of the notice-and-comment process. EPA plans to open a public comment period in the coming weeks. There are no penalties associated with this update at this time.

Revisions to the procedures for chemical risk evaluation Under the Toxic Substances Control Act (proposed rule)

The Toxic Substances Control Act (TSCA) section 6(b)(4)(B) requires the United States Environmental Protection Agency (EPA) to establish a process to conduct substance risk evaluations that meet applicable statutory requirements. The 2017 Final Rule was the original framework, which was further revised by the 2024 Final Rule introducing new requirements. In 2025 EPA is proposing to revise previously implemented changes, as it believes them to be inefficient and inconsistent with current law and administration policy.

Provisions being reconsidered are the following:

- whether TSCA necessitates a single risk determination for each chemical substance evaluated versus a risk determination for each condition of use of the given chemical substance (Unit III.B)
- whether EPA must evaluate all conditions of use and all exposure routes and pathways in a risk evaluation (Unit III.A.3)
- whether and how the use of personal protective equipment and engineering and administrative controls in an occupational work environment should be considered (Unit III.C.1)
- certain regulatory definitions and whether regulatory definitions should be broader than the statutory definitions (Unit III.D.2)
- what process EPA should follow when reconsidering aspects of a risk evaluation (Unit III.E)

Specific amendments to regulations:

- 40 CFR 702.31 to apply procedure changes to all risk evaluations initiated on or after the date of the final rule; in process as of the date of the final rule, but not yet finalized, to the extent practicable
- 40 CFR 702.33 to revise or add definitions to ensure transparency and accountability in conducting risk evaluations
- 40 CFR 702.37 and 40 CFR 702.39 to remove provisions in the 2024 final rule that require EPA to consider every condition of use and every exposure route and pathway based on reasonably available information without exception when conducting a risk evaluation under TSCA section 6(b)
- 40 CFR 702.39 to return to the risk determination approach in the 2017 final rule, which required EPA to make a determination of unreasonable risk for each condition of use instead of a single risk determination on the chemical substance as a whole, and to clarify how EPA will take occupational exposure controls into account when conducting risk evaluations and making risk determinations
- 40 CFR 702.43 to revise procedures established in the 2024 final rule for whether and how EPA would endeavor to revise or supplement final scope documents and draft or final risk evaluations
- 40 CFR 702.45 to generally scale back the information collection obligations that the 2024 final rule imposed on requesting manufacturers, and to clarify that manufacturers that withdraw a request before it is granted do not incur fees.

Apart from framework amendments, EPA is also proposing amendments to the process and requirements that manufacturers (including importers) would be required to follow when they request an Agency-conducted TSCA risk evaluation on a particular chemical substance (Unit III.F). Comments on this rule were due on 7 November 2025.

House of Representatives introduces the Alan Reinstein Ban Asbestos Now Act of 2025 to restrict use of commercial asbestos (announced)

On 16 September 2025, the United States House of Representatives introduced H.R. 5373, the Alan Reinstein Ban Asbestos Now Act of 2025. The bill would prohibit any person from manufacturing, processing, using, or distributing commercial asbestos or any mixture or article containing commercial asbestos. "Commercial asbestos" is defined to include chrysotile (CAS No. 12001-29-5), crocidolite (CAS No. 12001-28-4), amosite (CAS No. 12172-73-5), anthophyllite (CAS No. 17068-78-9), tremolite (CAS No. 14567-73-8), actinolite (CAS No. 77536-66-4), richterite (CAS No. 17068-76-7), and winchite (CAS No. not available). This is the fifth time the bill has been introduced since 2018, and it currently has a low chance of becoming law.

The definition of "distribution in commerce" excludes two cases: 1) the end-use of mixtures or articles containing asbestos that were installed before enactment, and 2) distribution solely for the purpose of disposal in compliance with applicable requirements. The bill also clarifies that mixtures or articles in which commercial asbestos are present solely as an impurity are outside scope.

A time-limited carve-out would allow chlor-alkali facilities operating on the enactment date to continue using asbestos diaphragms until 1 January 2030. A national security exemption may be granted by the President for up to three years, with one possible three-year extension, where the use is necessary and no feasible alternative exists.

Penalties are not mentioned in the bill text provided.

OCEANIA

Australia

The September 2025 update to the Industrial Chemicals Categorization Guidelines includes 118 new high-hazard chemicals (effective)

The Australian Industrial Chemicals Introduction Scheme (AICIS) has released the September 2025 Industrial Chemicals Categorization Guidelines and updated the online guide to categorizing chemical importation and manufacture. The update aligns with the annual AICIS registration cycle and reflects minor edits and additions to improve clarity and usability.

The updated guidelines include 118 new high-hazard chemicals, minor clarifications on demonstrating absence of skin corrosion and sensitization hazards, improvements to Part 8 on chemicals with high hazards and acceptable test guidelines, and minor formatting and footnote edits. Two chemicals (CAS 395058-31-8 and 395058-32-9) were removed from the list. The guidelines must be used alongside the Industrial Chemicals (General) Rules 2019. The September 2025 updates took effect on 1 September 2025.

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Update to Rolling Action Plan on the introduction and use of 522 per- and poly-fluoroalkyl substances (published)

The Rolling Action Plan (RAP) of the Australian Industrial Chemicals Introduction Scheme (AICIS) has been updated to include an evaluation, EVA00204, on the introduction and use of 522 per- and polyfluoroalkyl substances (PFAS). Importers or manufacturers of industrial chemicals (introducers) who were registered with AICIS between 1 September 2023 and 31 August 2025 must provide the following information for each chemical introduced:

- CAS number
- name of the chemical
- the mode of introduction (i.e., import and/or manufacture)
- the total volume introduced
- end use

The announcement indicates that registered introducers will be contacted within one week of the announcement. They must then respond within 40 days with the requested information. The PFAS evaluation, EVA00204, is scheduled to run until 31 December 2026.

There are no penalties associated with this update, but it is mandatory and failure to comply would be subject to penalties under the Industrial Chemicals Act 2019 (IC Act).

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