

# Newsletter

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



**Vol.5, Issue 11**

# NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,  
Policies, and Standards  
Issue 11 – 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](mailto: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](mailto:mLawriemunro@iaeg.com).

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## GLOBAL

### The International Civil Aviation Organization adopts a new global framework for sustainable aviation fuel (announced)

The International Civil Aviation Organization (ICAO) announced the adoption of a [new global framework for sustainable aviation fuel](#) (SAF) at the Third ICAO Conference on Aviation and Alternative Fuels (CAAF/3). The framework establishes a collective global vision to accelerate the transition to cleaner energy sources in international aviation. It emphasizes the development and deployment of SAF, lower carbon aviation fuels (LCAF), and other clean energy solutions. Member States are encouraged to contribute voluntarily through national action plans. ICAO will support implementation through capacity building, financing, and technology transfer. The framework is non-binding and intended to guide international collaboration.

### Science Based Targets initiative releases second draft Corporate Net-Zero Standard Version 2 (consultation)

On 6 November 2025, the Science Based Targets initiative released a [second draft of its revised Corporate Net Zero Standard Version 2](#) for a second public consultation with a deadline of 12 December 2025 for comments. The draft reflects feedback from the first consultation and expert working groups and is intended to reinforce scientific integrity while improving clarity, actionability, and usability for companies.

The draft aims to accelerate corporate decarbonization by making science-based climate action more accessible and actionable, providing a stronger and more inclusive framework with enhanced differentiation for different sectors and geographies, and offering a focused yet flexible approach to both operational and value chain emissions. It emphasizes net zero as the long-term objective alongside urgent near-term action, including expectations for validated companies to align near term actions in their operations and value chains with long term climate goals and to publish transition plans. The draft introduces a scope specific target setting approach with separate requirements for scope 1 and scope 2 targets, provides science-based options that reflect different corporate contexts and decarbonization levers, introduces a recognition mechanism for companies taking early voluntary action to address ongoing emissions, and sets clearer expectations on measuring and disclosing progress to support transparency and accountability.



## ASIA

### Armenia

#### Approval of the “Programme of Framework Actions for the Development of a Green, Sustainable and Circular Economy (up to 2030)” (in force)

On 12 November 2025, the Prime Minister of the Republic of Armenia adopted Decision No. 1028 L approving the “Programme of Framework Actions for the Development of a Green, Sustainable and Circular Economy (up to 2030)” that entered into force on 13 November 2025. The Program is developed in the context of the Government’s 2021 to 2026 program and action plan. It aims to support low carbon industry, the creation and expansion of green jobs, additional value creation in the economy, improved competitiveness, green energy, sustainable agriculture and agro tourism, while addressing the negative environmental impacts of economic activity.

The Program sets out definitions, describes the concept of green economy, and summarizes Armenia’s recent economic performance, highlighting that green investments have not been directly reflected in existing indicators in the absence of a national taxonomy. It establishes key principles and targets, including a 15 percent share of renewable energy in primary energy, commissioning up to 300 MW (1200 MWh) of energy storage, reaching 100 000 electric vehicles, reducing economy wide greenhouse gas emissions by 40 percent compared with 1990 and lowering specific energy intensity in value chains to 5 to 8 percent.

The Program identifies directions for a green, sustainable and circular economy across all sectors, such as energy, transport, agriculture, industry, buildings, waste and wastewater management, finance, education, and awareness, and presents a financial assessment of around 1.4 billion Armenian dram for implementing the actions. It foresees financing mainly from non-budgetary sources and resources generated through the implementation of relevant policies and provides for monitoring by the responsible ministry in cooperation with other state administration and sectoral bodies, based on annual data collection and indicators for green investments, resource intensity and emissions, as outlined in the Program and its Table No. 1.

Penalties are not mentioned in the update. More information can be found [here](#) in Armenian.

### China

#### Draft national ecological and environmental standard "Technical Specification for Pollution Control in the Treatment of Waste Electrical and Electronic Products" (consultation)

On 9 October 2025, the General Office of China’s Ministry of Ecology and Environment issued a notice to solicit public comments on the draft national ecological environment standard “Technical specification for pollution control in the treatment of waste electrical and electronic products”. The draft revises the existing standard HJ 527-2010 to implement

the Environmental Protection Law, the Solid Waste Pollution Prevention Law, and related legislation, and to deepen environmental management requirements for the treatment of waste electrical and electronic products.

The consultation was concluded on 11 November 2025. More information can be found [here](#) in Chinese.

## Japan

### Guidance on the handling of plastic recycled materials (published)

Japan's Ministry of Economy, Trade and Industry (METI) has issued guidance on the handling of plastic recycled materials under the Chemical Substances Control Law (CSCL), clarifying how such materials are treated depending on whether they are considered waste, chemical substances, or products. Based on discussions of the System Building Working Group held four times between October 2024 and June 2025, the notice explains that when considering the application of the CSCL to items made from used plastics, it is first necessary to determine whether the item is waste under the Waste Management Law (WML). If it is treated as waste, it falls outside the scope of the CSCL and other chemical substance-related regulations and is regulated under the WML.

Below are some takeaway points from the guidance:

- » If an item made from used plastics is not treated as waste under the WML, it is regarded as plastic recycled material. For such plastic recycled materials, it is then necessary to determine whether they fall under "chemical substances" or "products" as defined in the CSCL, with reference to a plastic recycled material judgment flow.
- » Where a plastic recycled material is regarded as a "chemical substance" under the CSCL, the regulations of that law apply according to the relevant regulatory category.
- » Where a plastic recycled material is regarded as a "product," the CSCL does not apply, except where it is a product designated by Cabinet Order, such as an import-prohibited product.
- » Where plastic recycled materials fall under "chemical substances," the guidance further clarifies, via a separate flow diagram, how CSCL obligations apply to different actors in the supply chain:
  - Manufacturers (entities that use plastic recycled materials to cause a chemical reaction that produces a new chemical substance) must determine whether a Class I specified chemical substance is newly generated as a by-product. Where such a Class I specified chemical substance is newly generated, a Best Available Techniques (BAT) report is required; where no Class I specified chemical substance is newly generated, they must keep track of the manufacturing quantity of general chemical substances and other substances as required under CSCL.
  - Importers must confirm whether plastic recycled materials contain a Class I specified chemical substance whose function is intentionally utilized, in which case import is prohibited; where a Class I specified chemical substance is present but its function is not being sought, a BAT report is required, and where no Class I specified chemical substance is present, import quantities of general and other substances must be tracked.
  - Users must not use plastic recycled materials that contain a Class I specified chemical substance where its function is intentionally utilized, while in cases where a Class I specified chemical substance is present, but its function is not being sought, no notification under the CSCL is required.

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

## Guidelines for notification of alternative chemical names of notifiable substances (Summary) (consultation)

On 17 October, Japan [published guidelines](#) (can also be found [here](#) in Japanese) for the notification of alternative chemical names of notifiable substances for [public comments](#), which would stand as an amendment to Japan's Industrial Safety and Health Act (comments were due on 17 November 2025). With the transition to an automated chemical management system, there is an expectation that even chemical substances with relatively low hazards will become subject to notification in the future. This could result in cases where reported chemical information could reveal company trade secrets. The use of alternate or substitute names was approved by the Act Partially Amending the Industrial Safety and Health Act and the Working Environment Measurement Act, commonly referred to as the Revised Act. These guidelines aim to implement this provision to protect proprietary information while supporting compliance. The draft proposal names a “transferor” of a notifiable substance who issues a safety data sheet (SDS), which should encompass manufacturers, importers, and distributors.

These guidelines propose a method for alternative chemical names based on abbreviating structural or compositional descriptors by deleting chemical elements with generic terms. These could be used to report information on SDS for chemical substances that fall under the category of trade secrets of companies but are limited to chemical substances with relatively low hazard potential, to the extent that it does not affect risk assessment. Conditions are given for when these alternate names may be used based on the hazard involved.

## Philippines

### Chemical Control Order for vinyl chloride (draft)

The Department of Environment and Natural Resources has circulated a [draft Chemical Control Order \(CCO\) for vinyl chloride](#) under Republic Act 6969. It establishes a risk-management framework covering importers, distributors, manufacturers, and industrial or commercial users, with specified exemptions for polymers, certain Food and Drug Administration or Bureau of Philippines Standards regulated products, and vinyl-chloride-containing mixtures in articles where applicable. The draft prohibits the use of vinyl chloride in aerosols as a propellant or ingredient and requires registration and permitting through the Online Permitting and Monitoring System.

Operational requirements include handling, storage and Globally Harmonized System labeling controls, engineering controls for manufacturing and use, designation of regulated areas, personal protective equipment, worker training, and hazardous-waste management. Regulated entities must prepare supporting documentation such as a Chemical Management Plan, a Contingency and Emergency Plan, and where relevant a Substitution and Phase-out Plan, together with Safety Data Sheets, process flow charts, training certificates, facility photos, the latest Self-Monitoring Report, and proof of payment. Importation requires a CCO Importation Clearance obtained via the same system, with record-keeping and validity rules, and compliance is monitored through periodic reporting.

Penalties for non-compliance include administrative and criminal sanctions under Sections 14 and 15 of Republic Act 6969 and Sections 43 and 44 of Department of Environment and Natural Resources (DENR) Administrative Order 1992-29, graduated administrative fines under DENR Memorandum Circular 2005-003, potential confiscation of chemicals under Environmental Management Bureau Memorandum Circular 2020-012, and possible joint liability of importers, distributors and end users for damages and restoration.

## Turkey

### National waste management strategy and plan for 2025-2035 (published)

On 17 October 2025, the Ministry of Environment, Urbanization, and Climate Change published Türkiye's National Waste Management Strategy and Plan for 2025-2035. This details the country's legal framework and historical planning efforts in environmental management. The document highlights that current national legislation covers numerous waste types, from municipal and packaging waste to hazardous and medical waste, guided by a waste management hierarchy. Significant data are presented regarding 2024 waste generation, reporting approximately 40.4 million tonnes of municipal and recyclable waste, with recovery, landfill, and dumping percentages specified.

The plan outlines 2035 targets, including recycling at least 60% of municipal waste and restricting single-use plastics, and forecasts substantial investments, particularly for incineration plants, to increase facility capacity. The plan also includes current capacity and future projections for managing specialized waste streams, such as medical and hazardous waste.

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

## Vietnam

### Circular on declaration of conformity and methods of assessing conformity with standards and technical regulations (draft)

Vietnam's Ministry of Science and Technology has drafted a [Circular](#) (can also be found [here](#) in Vietnamese) on declaration of conformity, declaration of technical conformity, and methods of assessing conformity with standards and technical regulations. [Notified to the WTO](#) on 7 November 2025 and open for comment until 27 December 2025, the draft is proposed for adoption on 31 December 2025, with entry into force on 1 January 2026. It is issued pursuant to the amended Law on Product and Goods Quality and the Law on Standards and Technical Regulations and will replace Circular No. 28/2012/TT-BKHCN and its amending circulars once it takes effect.

The draft establishes a clear distinction between a voluntary "declaration of conformity" with standards and a mandatory "declaration of technical conformity" with technical regulations. For both pathways, organizations and individuals may base their declarations on results from third-party conformity assessment bodies or on self-assessment. In the case of mandatory declarations, self-assessment must be supported by test results from recognized or designated testing organizations. The Circular specifies eight conformity assessment methods, such as testing of typical samples and assessment of management systems and requires the selected method to be appropriate to ensure reliable assessment results. Furthermore, the Circular defines conformity marks, sets their design and use requirements, and provides that they are regulated by registered certification organizations and may not be used where conformity is declared solely based on self-assessment.

All declarations must be registered via the National Database on Standards, Metrology and Quality using standardized forms, and declarants must maintain supporting technical documentation. Declarants are responsible for ongoing monitoring of conformity, recalling non-conforming products where required, and correcting non-conformities before products or services are returned to the market.



## EUROPE

### European Union

#### Simplifications for the Carbon Border Adjustment Mechanism (published)

The European Commission published [simplifications to the Carbon Border Adjustment Mechanism](#) (CBAM), which will apply from 1 January 2026. These updates aim to ease the administrative burden for importers during the transitional phase of CBAM, which began in October 2023. Key changes include streamlined reporting requirements and the introduction of default values for embedded emissions in imported goods, particularly for sectors such as iron and steel, aluminum, cement, fertilizers, electricity, and hydrogen.

While the regulation does not explicitly target aerospace and defense manufacturers, firms operating in these sectors may be indirectly affected if their supply chains involve CBAM-covered materials (e.g., aluminum or steel). Companies importing such materials into the European Union should assess if the simplified procedures alter their compliance obligations. Importers expecting to exceed the 50-tonne threshold must apply for Authorized CBAM Declarant status by 31 March 2026, and the first full compliance deadline – submission of the 2026 emissions report and surrender of CBAM certificates – falls on 30 September 2027. The update does not introduce new penalties, but under the broader CBAM framework, importers who fail to surrender sufficient CBAM certificates may face fines of approximately €100 per ton of CO<sub>2</sub> not covered, and unauthorized importers exceeding the exemption threshold may be liable for penalties on all emissions from that year.

#### Addition of 1,1'-(ethane-1,2-diyl)bis[pentabromobenzene] to the Candidate List (published)

Published on 5 November 2025, the European Chemicals Agency (ECHA) announced that its Member State Committee confirmed the [addition of 1,1'-\(ethane-1,2-diyl\)bis\[pentabromobenzene\]](#) (DBDPE; EC No. 284-366-9, CAS No. 84852-53-9) to the [Candidate List](#) of substances of very high concern at its October meeting. The substance was identified as very persistent and very bio-accumulative, meeting the criteria of Article 57(e), and is used as a flame retardant. ECHA stated that this identification will support potential restriction work on brominated flame retardants. The Candidate List now contains 251 entries, noting that some entries are groups of chemicals. ECHA explains that Candidate List inclusion means the substance may be placed on the Authorization List in the future and that legal obligations apply under REACH and the Waste Framework Directive once a substance is listed, whether supplied on its own, in mixtures, or in articles.

If an article contains DBDPE above 0.1 percent by weight, suppliers must provide customers and consumers with information on safe use, and consumers have the right to ask whether products contain substances of very high concern. Importers and producers of articles containing DBDPE must notify ECHA within six months of the listing date, giving a notification deadline of 5 May 2026. Suppliers of Candidate List substances supplied on their own or in mixtures must update the safety data sheet provided to customers. Under the Waste Framework Directive, companies must also notify ECHA when articles they produce contain substances of very high concern above 0.1 percent by weight, with notifications published in ECHA's SCIP database.

Penalties are not mentioned in the update.

## Regulation (EU) 2025/1482 regarding tetrabromodiphenyl ether, pentabromodiphenyl ether, hexabromodiphenyl ether, heptabromodiphenyl ether and decabromodiphenyl ether (published)

On 28 October 2025, the European Commission published [Delegated Regulation \(EU\) 2025/1482](#), which amends Annex I of Regulation (EU) 2019/1021 on persistent organic pollutants. The amendment updates the unintentional trace contaminant limit values for tetrabromodiphenyl ether, pentabromodiphenyl ether, hexabromodiphenyl ether, heptabromodiphenyl ether, and decabromodiphenyl ether in mixtures and articles, referred to as the five PBDEs (EC and CAS Numbers were not provided in the regulation).

The revised entries introduce a general limit value of 10 milligram/kilogram (mg/kg) for the five PBDEs in mixtures and articles upon entry into force. For mixtures or articles containing recovered material, transitional limits apply as follows: 500 mg/kg upon entry into force, 350 mg/kg from 30 December 2025, and 200 mg/kg from 30 December 2027. These changes update all PBDE entries in Annex I of Regulation (EU) 2019/1021.

Penalties are not mentioned in the update.

## Critical Raw Materials Centre (proposal)

The European Commission has published an initiative proposing a European Union (EU) [Critical Raw Material Centre](#) regulation. In line with the [Draghi report](#)'s recommendations, the Centre will coordinate actions across four key areas: joint purchasing, strategic stockpiling, targeted investments, and raw materials intelligence to strengthen supply security and reduce external dependencies on critical raw materials.

A public consultation is planned to be opened soon.

## Amendment to the European Union deforestation regulation to simplify reporting requirements (draft)

On 9 June 2023, the European Commission published [Regulation \(EU\) 2023/1115](#) (EUDR) to regulate the trade of products made using ingredients/products associated with deforestation practices, with the objective of reducing their use and therefore helping to reduce deforestation at the global scale.<sup>1</sup> The affected categories, known in the Regulation as “relevant commodities”, are cattle, cocoa, coffee, oil palm, rubber, soya and wood. The full list detailing the individual ingredients/products, “relevant products” in the Regulation, can be found in Annex I.

On 21 October 2025, the European Commission published a [new proposal](#) to amend Regulation (EU) 2023/1115 to simplify reporting requirements for enterprises and administrations, as the current load is very high for both these stakeholders and the information system designed to receive this information. To do this, the proposed regulation introduces a new one-time simplified declaration to be used instead of the due diligence statement by micro and small primary operator and downstream operator. The proposal adds definitions for these operator categories, as well as updating some of the existing definitions.

The one-time simplified declaration requires micro and small primary operators to submit this declaration once, with the information listed in the new Annex III, to receive a declaration identifier. They will need to update this information if any changes take place. If the Annex III information already exists in other Member States information systems (due to other

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<sup>1</sup> Also see IAEG's [Alert on EUDR](#).

regulation requirements), then it is the Member States that must submit the information to the EUDR information system on behalf of micro and small primary operators, who will still receive a declaration identifier.

Downstream operators and traders have information requirements, including obtaining contact information of their suppliers and their relevant reference numbers of the due diligence statements or the declaration identifiers, and obtaining contact information of downstream operators or traders they are supplying to. They must share the relevant reference numbers of the due diligence statements or the declaration identifiers with downstream operators or traders to whom they are supplying.

Further amendments are made to ensure the text works with the introduced one-time simplified declaration, and to reinforce compliance checks by Member States. The proposed application dates are 30 December 2025, 30 June 2026 and 30 December 2026, depending on the specific articles.

## Proposed harmonized classification and labeling for Imidazole hydrobromide and 1-methylimidazole (consultation)

The European Chemical agency is proposing new harmonized classification and labeling for two substances, with comments due on 19 December 2025:

- » [Imidazole hydrobromide](#) (EC No. 483-310-2; CAS No. 101023-55-6) is proposed for classification as Repr. 1B, H360FD (may damage fertility and the unborn child) and Lact., H362 (may cause harm to breastfed children). The consultation seeks comments specifically on its reproductive toxicity classification.
- » [1-methylimidazole](#) (EC No. 210-484-7; CAS No. 616-47-7) currently has classifications for acute toxicity and skin corrosion. The proposed update includes Acute Tox. 4, H302 (oral), Acute Tox. 3, H311 (dermal), Skin Corr. 1B, H314, and Repr. 2, H361d (suspected of damaging fertility).

The consultation seeks comments on reproductive toxicity and acute toxicity via oral, dermal, and inhalation routes.

## Call for Evidence for a study report under the Batteries Regulation (EU) 2023/1542 (consultation)

Published on 12 November 2025, the European Chemicals Agency (ECHA) launched a [call for evidence](#) to support preparation of a study report under the Batteries Regulation ([Regulation \(EU\) 2023/1542](#)). The Regulation entered into force on 17 August 2023 and replaced Directive 2006/66/EC, aiming to minimize environmental impacts and promote circularity in the batteries sector in light of evolving technologies, markets, and battery uses.

The European Commission must prepare a report by 31 December 2027 identifying substances of concern in batteries, including those that hamper recycling, and ECHA is collecting evidence to support this work. Information is sought on substances present in batteries or used in their manufacturing process, recycling technologies, emissions and exposures, and substances that may hinder recycling of end-of-life batteries. The call targets stakeholders across the battery supply chain, including manufacturers, importers, distributors, downstream users, and recyclers, as well as other organizations with relevant information. Submissions can be made confidentially, and while the call is primarily aimed at European Union (EU) and European Economic Area stakeholders, non-EU stakeholders are encouraged to contribute where they have relevant evidence.

## France

### Decree on batteries and waste batteries (in force)

On 29 October 2025, France published Decree No. 2025-992 on batteries and waste batteries, which establishes the national sanctions regime for infringements of [Regulation \(EU\) 2023/1542](#) on batteries and waste batteries. The decree amends the Consumer Code by adding a new Sub-section 30 “Batteries and waste batteries” in Section 4 of Chapter II, Title I, Book IV and inserts Article R. 412-43-3.

Article R. 412-43-3 specifies that, for products intended for consumers, a defined set of provisions of Regulation (EU) 2023/1542 and its annexes constitute implementing measures under Article L. 412-1 of the Consumer Code. These include Articles 1 and 3, Article 4(2), Articles 5 to 13, Article 14(1) to (4), Articles 15 to 20, Articles 38 to 46, Articles 52 and 62, Articles 77 and 78, Article 79(3) and Article 81(2) of Regulation (EU) 2023/1542.

As a result, non-compliance with these provisions can be investigated and recorded by the enforcement officers referred to in Article L. 511-3 of the Consumer Code and is punishable under Article R. 451-1 of the same Code, which provides for fifth-class contraventions. The decree applies to operators in the batteries sector and the competent control authorities.

Infringements of the listed provisions of Regulation (EU) 2023/1542, as they apply to products intended for consumers, are subject to fifth-class contraventions under Article R. 451-1 of the Consumer Code, enforceable by the officers referred to in Article L. 511-3.

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

## Netherlands

### Amendment to the pZZS list (published)

Netherlands’ National Institute for Public Health and the Environment (RIVM) has proposed amending the methodology used for identifying substances on the [pZZS list](#),<sup>2</sup> which includes potentially substances of very high concern (SVHCs). Key adjustments involve establishing a distinction between early warning and serious warning to indicate the amount of available information and the stage of the European research process. In addition, the requirements for substance inclusion will be tightened, aiming to increase the probability that listed substances are confirmed as SVHCs following further testing.

The revised approach will also incorporate more European research lists for identification and will no longer remove substances with a self-classification from the review process. This comprehensive review is being assigned to the RIVM and is projected to be completed by mid-2026.

More information can be found [here](#) in Dutch. The RIVM Report of the exploration can be found [here](#).

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<sup>2</sup> pZZS is Dutch for SVHC, substances of very high concern.

## United Kingdom

### Amendments to the Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024 (draft)

The United Kingdom (UK) is proposing amendments to the Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024, which establish the UK extended producer responsibility framework for packaging. The [amendments](#) revise multiple parts of the 2024 regime, including producer scope and obligations, packaging material category definitions, reporting and record keeping, disposal and administration fee methodology, and scheme administration.

The draft updates definitions for packaging categories, including revisions to “fiber-based composite material” and the introduction of “paper or board”, with a requirement for producers to evidence that plastic layers are not more than five percent by mass to classify packaging as paper or board. The charity exclusion is narrowed so charities are only excluded from provisions that impose producer obligations and fee liability. New evidence retention duties are introduced for large producers participating in closed loop recycling, including evidence from accredited re-processors or exporters that packaging waste meets the closed loop definition and has been recycled into food grade plastic. The disposal and administration fee rules are amended so closed loop packaging waste may be offset against household packaging waste tonnages used for fee calculations, modulation is permitted based on whether packaging is no more than reasonably necessary, and late fee assessments are enabled. Provisions are added for corporate mergers and transfers requiring new registration or re-registration in specified cases, and the scheme administrator may appoint one or more Producer Responsibility Organizations to carry out defined functions with authority consent.

The draft is proposed to come into force on 1 January 2026. Transitional measures allow amended producer reports for periods ending 30 June 2024 or 31 December 2024 to be submitted by 28 January 2026, and for the period ending 30 June 2025 by 1 April 2026, with a £2,548 charge payable for certain amended and related reports by 28 January 2026. For charities acting as re-processors or exporters, registration and related offence or civil sanction provisions do not apply before 1 January 2027, with 1 October 2026 referenced for certain registration timings.

Penalties for non-compliance include offences and civil sanctions under the 2024 Regulations as amended, but the draft does not specify fine levels.

### Three substances recommended for inclusion in UK REACH Authorization List (Annex 14) (consultation)

The Health and Safety Executive (HSE) has prepared a 2025 draft [recommendation to add three substances](#) of very high concern to the UK REACH Authorization List (Annex 14). Once listed, these substances could only continue to be used or placed on the market in Great Britain (GB) after the relevant sunset date where an authorization has been granted for specific use.

The three substances recommended for inclusion are:

- » 2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate (DOTE) (EC No. 239-622-4; CAS No. 15571-58-1) – mainly used as an organotin heat stabilizer in plastics at industrial sites, for example in the formulation of PVC mixtures and the manufacture of PVC articles
- » reaction mass of 2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate and 2-ethylhexyl 10-ethyl-4-[[2-[(2-ethylhexyl)oxy]-2-oxoethyl]thio]-4-octyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate (reaction mass of DOTE and MOTE) (EC No. DOTE: 239-622-2 and MOTE: 248-277-6; CAS No. DOTE: 15571-58-1)

and MOTE: 27107-89-7) – a multi-constituent substance containing DOTE and MOTE, used as a heat stabilizer in plastics, including in dry PVC blends and PVC article production

- » tetraethyllead (EC No. 201-075-4; CAS No. 78-00-2) – historically used as an anti-knock agent in leaded gasoline (petrol) for its octane-boosting properties; its use in automotive fuel has been phased out globally

All three substances are identified as substances of very high concern due to their classification as toxic to reproduction in the GB Mandatory Classification and Labelling list (Article 57(c) of UK REACH).

In addition, HSE is inviting GB-specific information on the following additional substances to support future prioritization work for recommendations to the UK REACH Authorization List (Annex 14):

- » the reaction products of 1,3,4-thiadiazolidine-2,5-dithione, formaldehyde and 4-heptylphenol, branched and linear (RP-HP) [with  $\geq 0.1\%$  w/w 4-heptylphenol, branched and linear]
- » 4,4'-bis(dimethylamino)-4''-(methylamino)trityl alcohol [with  $\geq 0.1\%$  of Michler's ketone (EC No. 202-027-5; CAS No. 90-94-8) or Michler's base (EC No. 202-959-2; CAS No. 101-61-1)]

## Reform of the hydrofluorocarbon phasedown schedule in the fluorinated gas regulation (consultation)

The Department for Environment, Food, and Rural Affairs (Defra) has opened a [consultation](#) on reforms to the hydrofluorocarbon (HFC) phasedown schedule in the fluorinated gas (F gas) regulation for Great Britain (GB). The proposal would change the existing phasedown schedule in Annex 5 from 1 January 2027 and introduce additional phasedown steps from 2030 to 2050.

Under the preferred high ambition option, the proposal would:

- » replace the current target of a 79 percent reduction in HFCs placed on the GB market by 2030
- » introduce a more stringent phasedown that reaches a 98.6 percent reduction in HFCs placed on the GB market by 2048, relative to the 2015 to 2019 baseline

The proposal has been developed jointly by the United Kingdom, Scottish, and Welsh governments, while the consultation is being conducted by the Defra Secretary of State as the phasedown is a reserved matter. If the government decides to proceed after considering consultation responses, the reforms would be implemented through legislative amendments to the F gas Regulation. Supporting documents include a consultation document, a De Minimis Assessment and a Technical Assumptions and Data spreadsheet.

Responses due on 17 December 2025 are encouraged via the online Citizen Space survey, although email and postal submissions are also accepted, provided they are received by the closing date.



## NORTH AMERICA

### Canada

#### Amendment to the Non-domestic Substances List (published)

The Department of the Environment issued [Order 2025-87-10-02](#) to amend the Non-Domestic Substances List (NDSL) under subsection 87(5) of the Canadian Environmental Protection Act, 1999. The NDSL is a list of substances that are not used commercially in Canada above trigger quantities specified in the New Substances Notification Regulations (Chemicals and Polymers), but that are known to be in international commerce. Substances on the NDSL are subject to the notification and requirements set out in the New Substances Notification Regulations (Chemicals and Polymers); however, they are subject to fewer information requirements in comparison to new substances that are not on the NDSL.

Part I of the NDSL is amended by deleting the substance 1-propanaminium, N,N,N-trimethyl-3-[(2-methyl-1-oxo-2-propen-1-yl)amino]-, chloride (1:1), polymer with 2-propenamamide and 2-propenoic acid, sodium salt (with identifier 321657-09-4). This substance may be used in textiles and paper processing, water treatment, surfactants and disinfectants, coatings and adhesives.

There are no penalties associated with the update.

#### Ministerial Condition No. 22325 (in force)

On 11 October 2025, the Department of the Environment published [Ministerial Condition No. 22325](#) for the substance 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-1-(2,2,2-trifluoroethyl)-5-(2,3,6-trifluorophenyl)-3-piperidinyl]-2'-oxo-, (3'S)- (CAS No. 1374248-81-3). The notice states that the Minister of the Environment and the Minister of Health have assessed information on the substance and suspect that it is toxic or capable of becoming toxic within the meaning of section 64 of the Canadian Environmental Protection Act, 1999 (CEPA). On that basis, the Minister of the Environment, under paragraph 84(1)(a) of CEPA, permits the manufacture or import of the substance subject to the conditions set out in the annex.

Requirements under Ministerial Condition No. 22325:

- » Before manufacturing the substance in Canada, the notifier must inform the Minister of the Environment at least 120 days in advance. The notification must include the expected annual quantity, the address of the manufacturing facility, exposure and release information (including transport and storage, anticipated environmental and municipal wastewater releases, and recommended destruction or disposal methods), a brief description and flow diagram of the manufacturing process and operations, and a summary of all other available information and test data relevant to environmental and human health hazards and exposure.
- » If any release of the substance or waste containing it occurs, the notifier must immediately take all necessary measures to stop the release and limit its dispersion, and must, as soon as possible, notify an enforcement officer or the 24-hour emergency contact listed for the province or territory in the Release and Environmental Emergency Notification Regulations.

- » Before transferring the physical possession or control of the substance to another person, the notifier must inform that person in writing of the terms of the ministerial condition and obtain written confirmation that they have been informed and agree to comply.
- » The notifier must keep electronic or paper records on the use of the substance, the quantities manufactured, imported, purchased, distributed, sold and used, the names and addresses of people to whom the substance is transferred, and the written confirmations received. Records must be created within 30 days after the information becomes available, updated within 30 days of any change to recipients' addresses, and kept at the notifier's (or representative's) principal place of business in Canada for at least five years. Records may be kept in English, French, or both, and any electronic records must be in a readable format.

Penalties are not mentioned in the update.

## Proposed addition of hexanedioic acid, diisodecyl ester and manganese and its compounds to the Domestic Substances List (consultation)

On 25 October 2025, the Ministers of Environment and Health announced their intent to amend the Domestic Substances List (DSL) to apply the Significant New Activity provisions to [hexanedioic acid, diisodecyl ester](#) (DIDA, CAS No. 27178-16-1) and to [manganese and its compounds](#). These amendments would require notification to the Minister at least 90 days prior to any new activity involving DIDA in certain consumer products, cosmetics, natural health products, or non-prescription drugs exceeding specified concentration thresholds.

The proposal aims to ensure that any new or increased use of DIDA undergoes assessment to determine potential risks to human health or the environment under section 64 of CEPA. Exemptions apply for research and development substances, site-limited intermediates, and products intended solely for export.

Manganese and its compounds would be added to Part 2 of Schedule 1 to the Act. Schedule 1 of CEPA lists all substances considered toxic or capable of becoming toxic and which will be further assessed to decide which regulatory measures should be established to control their hazards.

Stakeholders may submit comments or information relevant to the proposed changes until 24 December 2025.

## [United States](#)

### The California Air Resources Board preliminary draft list of potentially affected companies under its new climate disclosure laws (published)

The California Air Resources Board (CARB) has recently published a [draft list](#) of potentially affected companies under its new climate disclosure laws. While this list offers initial guidance, it is not exhaustive, and additional firms may still be subject to compliance. CARB has also released a draft reporting template to assist entities in preparing disclosures. These materials, including technical guidance and frequently asked questions, are available on the [CARB webpage](#).

California's climate disclosure laws – SB 253 and SB 261 (Health & Safety Code §§38532–38533) – establish mandatory reporting requirements for large entities operating in the state. SB 253 applies to firms with annual revenues over \$1 billion and requires annual reporting of Scope 1 and 2 greenhouse gas (GHG) emissions starting June 30, 2026. Scope 3 reporting

begins in 2027, with third-party assurance escalating from limited (2026) to reasonable (2030). SB 261 applies to firms with revenues over \$500 million and mandates biennial disclosure of climate-related financial risks beginning January 1, 2026.

Non-compliance may result in administrative penalties enforced by CARB, though specific fine amounts are not yet detailed. Firms subject to SB 253 and SB 261 should anticipate annual fees of approximately \$3,106 (SB 253) and \$1,403 (SB 261). Reporting must align with the GHG Protocol (SB 253) and frameworks such as TCFD or IFRS S2 (SB 261). Aerospace and defense firms are advised to assess their California footprint and begin preparing for compliance to mitigate regulatory and reputational risks.

## Extension of postponement of effectiveness for certain provisions of trichloroethylene regulation (published)

On 14 November 2025, the United States Environmental Protection Agency (EPA) published a [notification](#) extending the postponement of the effectiveness of certain provisions of the final rule “Trichloroethylene (TCE) (CAS No. 79-01-6); Regulation Under the Toxic Substances Control Act (TSCA)” for an additional 90 days. The extension applies to the conditions imposed on uses that are subject to TSCA section 6(g) exemptions in 40 CFR 751.325.

EPA explains that multiple petitions for review of the TCE final rule have been consolidated before the U.S. Court of Appeals for the Third Circuit and that the judicial proceedings remain ongoing. Using section 705 of the Administrative Procedure Act, EPA has determined that justice requires maintaining the postponement of the effective date of the conditions for each TSCA section 6(g) exemption until 17 February 2026, in order to preserve the status quo while the litigation is pending and as the EPA intends to reconsider the final rule, including the affected provisions, through notice and comment rulemaking.

Penalties are not mentioned in the update.

## Amendments of Significant New Use Rules of seven chemical substances and one microorganism (proposed rule)

The Environmental Protection Agency (EPA) opened a consultation on [a Proposed Rule](#) to amend the existing Significant New Use Rules (SNURs) found in 40 CFR part 721 and 40 CFR part 725 (for microorganisms). EPA is proposing these amendments to modify notification requirements, allow certain new uses reported in previous notices without requiring additional notification, modify requirements based on new test data, and implement technical amendments.

This Proposed Rule amends the SNURs for seven chemical substances and one microorganism. The regulation applies generally to entities that manufacture, process, or use the following substances:

- » benzoic acid, 3,3'-methylenebis [6 amino-, di-2-propenyl ester (CAS No. 61386-02-5)
- » D-glucuronic acid, polymer with 6-deoxy-L-mannose and D-glucose, acetate, calcium magnesium potassium sodium salt (CAS No. 595585-15-2)
- » 1,3-butanediol, 3-methyl- (CAS No. 2568-33-4)
- » 2-propenoic acid, 1,1'-(3-methyl-1,5-pentanediy) ester (CAS No. 64194-22-5)
- » 1-propene, 2-bromo-3,3,3-trifluoro- (CAS No. 1514-82-5)
- » arenesulfonic acid, alkyl derivatives, metal salts (generic)
- » trichoderma reesei (generic)

## Amendment to per- and polyfluoroalkyl substances reporting and recordkeeping under the Toxic Substances Control Act (announced)

The Environmental Protection Agency (EPA) opened a [consultation](#) on 13 November 2025, proposing amendments to the Toxic Substances Control Act (TSCA) regulation for reporting and recordkeeping requirements for perfluoroalkyl and polyfluoroalkyl substances (PFAS) with a deadlines of 15 December 2025 for the information collection provision and 29 December 2025 for general comments on the proposed rule.

TSCA Section 8(a)(7) added by the National Defense Authorization Act for Fiscal Year 2020, required the EPA to make a rule for reporting of data by all PFAS manufacturers or importers since 1 January 2011. The resulting rule, Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances, was finalized 11 October 2023 in the Code of Federal Regulations as 40 CFR Part 705. This proposed rule would amend parts of 40 CFR Part 705 to include exemptions and modifications to the scope of data collected. The following exemptions are added:

- » PFAS in a mixture or article below 0.1% de minimis concentration
- » imported articles
- » non-isolated manufacturing intermediates
- » by-products
- » impurities
- » research and development chemicals

The proposed rule introduces changes to some product categories and specifies that OECD-harmonized templates (OHTs)<sup>3</sup> are not required for exposure-related information otherwise submitted through the fielded data elements in the reporting application. The data submission window would also be shortened to start 60 days after the final rule is published and last 3 months. There is also a Paperwork Reduction Act amendment to update the Information Collection Request.

More information can be found in this [announcement](#) from the EPA.



## OCEANIA

### [Australia](#)

#### Nonadecane, 9-methylene-, mixed with 1-decene, dimers and trimers, hydrogenated added to the Australian Inventory of Industrial Chemicals (published)

The Australian Industrial Chemicals Introduction Scheme (AICIS) has [announced](#) that the industrial chemical nonadecane, 9-methylene-, mixed with 1-decene, dimers and trimers, hydrogenated (CAS No. 1000172-32-6) has been added to the Australian Inventory of Industrial Chemicals under section 82 of the Industrial Chemicals Act 2019, as five years have passed since the assessment certificate for this industrial chemical was issued. The notice highlights that specific information

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<sup>3</sup> OECD = Organization for Economic Co-operation and Development

obligations apply to this chemical. Introducers must notify AICIS within 28 days if the circumstances of their importation or manufacture (introduction) differ from those considered in the original assessment.

Penalties are not mentioned in the update.

## Proposed standards for ten classes of industrial chemicals under the Industrial Chemicals Environmental Management Standard (consultation)

The Department of Climate Change, Energy, the Environment, and Water is conducting a [statutory public consultation](#) on proposed standards under the Industrial Chemicals Environmental Management Standard (IChEMS). IChEMS is a national approach to managing the use, storage, handling, and disposal of industrial chemicals and provides nationally consistent environmental standards for these chemicals. The framework addresses environmental risks from industrial uses of chemicals; it does not manage risks to human health and does not regulate medical or agricultural uses.

The consultation covers proposed scheduling decisions for ten classes of industrial chemicals:

- » carbonodithioic acid, O (2 methylbutyl) ester, sodium salt (1:1) and carbonodithioic acid, O (3 methylbutyl) ester, sodium salt (1:1)
- » 1,3 propanediamine, N [3 (C11 14 isoalkyloxy)propyl] derivs., C13 rich, acetates (Lilaflo 817M)
- » medium and long chain alkyl sulfonates
- » ethoxylated alcohols (Group A)
- » ethoxylated alcohols (Group B)
- » parabens
- » short chain alkyl and aryl phthalates
- » lead(2+) salts of long chain carboxylic acids
- » lead(2+) salts of medium chain carboxylic acids
- » dibutylphthalate, di(2 ethylhexyl)phthalate and diisooctylphthalate

Supporting consultation documents include proposed scheduling decision papers for each chemical or chemical group, indicative lists of covered chemicals with names and CAS Registry Numbers, and chemical profile documents describing environmental concerns. Submissions must be made via the online survey, which also allows attachments. Feedback will inform final standards that will be listed in the IChEMS Register.

# NEWSLETTER

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