

# Newsletter

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



Vol.5, Issue 12

# NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,  
Policies, and Standards  
Issue 12 – 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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# NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations,  
Policies, and Standards  
Issue 12 – 2025



## TABLE OF CONTENTS



### GLOBAL..... 6

Decisions adopted by the Conference of the Parties to the Minamata Convention on Mercury at its sixth meeting (published).....	6
The International Sustainability Standards Board issues amendments to International Financial Reporting Standards S2 (published) .....	6
Greenhouse gas protocol to refine corporate GHG accounting (consultation) .....	7



### ASIA..... 7

#### China ..... 7

Temporary suspension of selected export-control requirements for a range of rare earth elements and critical elements (published).....	7
Approval of amendments to Annex A and Annex B of the Minamata Convention on Mercury (draft).....	8
Amendments regarding requirements for restricted use of hazardous substances in electrical and electronic products (draft).....	8

#### India..... 9

Department of Chemicals and Fertilizers Order rescinds quality control orders for twenty substances (in force).....	9
Revisions on the standards to use amino resins in paints and nickel formate in nickel catalysts for use in the hydrogenation of oils (consultation) .....	10

#### Japan ..... 11

Designation of three substances as Class I Specified Chemical Substances per decisions of the 12th Conference to the Parties to the Stockholm Convention (consultation).....	11
--	----

#### Philippines..... 12

Fifty-nine chemicals to be added to the Philippine Inventory of Chemicals and Chemical Substances (consultation).....	12
---	----

# NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,  
Policies, and Standards  
Issue 12 – 2025*



## Singapore.....12

MyEHS System becomes the new platform for notification and registration of environmentally hazardous substances (published) ..... 12

## South Korea.....13

Updates to K-REACH hazard assessment lists for new and existing substances (consultation)..... 13

## Taiwan .....13

Amendments to the “Announcement on the Control of Toxic Chemical Substances and Their Operation and Management” (consultation)..... 13



## EUROPE..... 14

### European Union .....14

Amendments to Directive 2011/65/EU on the restriction of certain hazardous substances in electrical and electronic equipment (published)..... 14

Temporary suspension of the requirement for packaging producers to appoint an authorized representative in each European Union Member State (published) ..... 15

Regulation (EU) 2025/2365 on preventing plastic pellet losses at all stages of the plastic pellet supply chain (in force) ..... 15

Regulation setting out the timing, management, and detailed rules for auctioning allowances under the second European Union Emissions Trading System (consultation) ..... 16

Restriction on use of certain non-polymeric aromatic brominated flame retardants (draft)..... 16

Update to the CLP Regulation EC No 1272/2008 (consultation)..... 17

Standardized formats and technical specifications for battery labeling (consultation)..... 17

Call for data and information that will be used to assess the impact of establishing new Occupational Exposure Limit values (OELs) for seven substances (consultation) ..... 18

Delegated act for exemptions from the reuse obligations for plastic wrappings and straps under the Packaging and Packaging Waste Regulation (draft)..... 18

The European Financial Reporting Advisory Group provides its technical advice on draft simplified European Sustainability Reporting Standards to the European Commission (consultation) ..... 18

Updates to Regulation EU 2019/1021 on persistent organic pollutants to implement decisions under the Stockholm Convention (consultation) ..... 19

# NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,  
Policies, and Standards  
Issue 12 – 2025*



## France .....19

Decree No. 2025-1081 extending obligations for producers of packaging and package products to promote circular economy (published) ..... 19

## Germany .....20

Packaging Law Implementation Act (consultation)..... 20

## Ireland .....20

Updates to the Clean Air Strategy (consultation)..... 20

## Poland.....21

Act to prohibit the use of products containing asbestos (published) ..... 21

Consolidated text of the Act on the greenhouse gas emission allowance trading scheme (published)..... 21

Amendments to the Act on Waste Electrical and Electronic Equipment and certain other acts (draft)..... 22



## NORTH AMERICA ..... 23

## Canada.....23

Addition of two substances to the Non-domestic Substances List (published) ..... 23

Updated human health risk characterizations for triphenyl phosphate, tris(2-butoxyethyl) phosphate, hydrogenated dodecene, and hydrogenated trimer and tetramer of decene (consultation)..... 23

Approach on the prioritization of chemicals in plastics (consultation)..... 24

## United States.....25

Significant New Use Rules on thirty-five chemical substances (24-4.5e) (published)..... 25

Washington State expands restriction on per- and polyfluoroalkyl substances in consumer products (published) ..... 25

Minnesota requires reporting of products containing intentionally added per- and polyfluoroalkyl substances sold in the state (adopted)..... 26

Draft risk evaluation for 1,2-dichloroethane (consultation) ..... 26

# NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,  
Policies, and Standards  
Issue 12 – 2025*



## OCEANIA ..... 27

### Australia.....27

Five chemicals added to Australian Industrial Chemicals Introduction Scheme inventory (effective) .....27



## GLOBAL

### Decisions adopted by the Conference of the Parties to the Minamata Convention on Mercury at its sixth meeting (published)

The sixth meeting of the Conference of the Parties (COP-6) to the Minamata Convention on Mercury took place in Geneva from 3 to 7 November 2025. On 23 November 2025, COP-6 published [22 decisions](#) from the meeting. The [Minamata Convention on Mercury](#) is a global treaty that aims to control, reduce and eliminate mercury use to protect human health and the environment, and entered into force on 16 August 2017.

The decisions made at the 6th meeting include:

- » updated guidance on mercury stocks, improved reporting forms, actions to address illegal mercury trade, and development of harmonized customs codes for mercury-containing goods
- » a request for Parties and stakeholders to submit information on the supply, use, and trade of mercury compounds
- » preparations for the first effectiveness evaluation of the Convention to assess global progress and impact
- » strengthening collaboration with major international chemicals and waste governance bodies (e.g., Science-Policy Panel, Global Framework on Chemicals, and the Basel, Rotterdam, and Stockholm Conventions).

Penalties are not mentioned in the update.

### The International Sustainability Standards Board issues amendments to International Financial Reporting Standards S2 (published)

The International Sustainability Standards Board (ISSB) has issued [targeted amendments](#) to International Financial Reporting Standards (IFRS) S2 to ease practical challenges in greenhouse gas (GHG) emissions disclosures while preserving key information for investors. These provide helpful flexibility for entities, including options to focus Scope 3 Category 15 reporting on financed emissions, use alternative classification systems, apply jurisdictional reliefs from the GHG Protocol or latest Intergovernmental Panel on Climate Change values where required, and align related Sustainability Accounting Standards Board Standards.

IFRS S2 mandates that organizations disclose climate-related physical and transition risks that could reasonably be expected to affect cash flows, access to finance, or cost of capital over the short, medium, and long term. Integrating the recommendations of the Task Force on Climate-related Financial Disclosures, this standard requires detailed reporting on governance, strategy, risk management processes, and performance targets to ensure investors understand the financial impact of climate issues on the entity. These disclosures must be applied in conjunction with IFRS S1, which establishes the general baseline requirements for disclosing all broader sustainability-related risks and opportunities.

The amendments to IFRS S2 apply to reporting periods beginning on or after 1 January 2027, with early adoption permitted. No additional timelines are specified. As ISSB Standards remain voluntary unless mandated locally, no penalties for non-compliance are outlined.

## Greenhouse gas protocol to refine corporate GHG accounting (consultation)

The greenhouse gas (GHG) Protocol is conducting [two key public consultations](#) to refine corporate GHG accounting: one revising the Scope 2 Guidance (from 2015) for better accuracy in electricity-related emissions reporting, including market-based methods, hourly matching, and feasibility considerations; and another introducing consequential methods for estimating avoided emissions from electricity interventions, suitable for separate impact reporting. These updates could help firms facing energy-heavy operations and supply chain complexities through improved Scope 2 calculations, enhanced renewable energy claims, and alignment with disclosure standards.

Both consultations require feedback by 31 January 2026. A follow-up Scope 2 consultation is expected in 2026, targeting final Scope 2 Standard publication in 2027.



## ASIA

### [China](#)

## Temporary suspension of selected export-control requirements for a range of rare earth elements and critical elements (published)

In November 2025, China issued two Ministry of Commerce (MoC) announcements temporarily suspending selected export-control requirements for a range of rare earth elements and critical minerals. The suspensions, which apply for twelve months, ease licensing and documentation obligations introduced under earlier MoC and General Administration of Customs of China (GACC) notices covering strategic materials used in high-technology and energy-storage applications.

Announcement No. 70 (2025) - Suspension applies to rare earth metals (holmium, erbium, thulium, europium, and ytterbium) and to lithium-battery materials (cathode materials, anode materials, and related manufacturing equipment and production technologies). Announcement No. 72 (2025) - Suspension applies to gallium, germanium, antimony, tungsten (including tungsten-based hard metals), and graphite.

The changes introduced by the suspension notices are procedural and include the following:

- » temporary exemption from selected export-control requirements, including licensing and prior-approval obligations for the listed materials
- » simplification of export procedures, allowing exporters to ship affected substances without undergoing the suspended controls, while remaining subject to China's overarching Export Control Law
- » defined suspension periods, with Announcement No. 70 applying until 10 November 2026 and Announcement No. 72 applying until 27 November 2026
- » continued compliance obligations, as all other export-control, customs, and classification requirements remain fully in force

For companies, the update reduces administrative steps and may ease short-term supply-chain constraints; however, exporters must monitor the suspension end dates and ensure readiness to re-apply full control procedures once the measures expire.

The suspension measures are currently in effect and will continue until their respective end dates in November 2026. No new penalties are introduced under these announcements; however, non-compliance with China's broader Export Control Law and customs regulations remains subject to administrative or legal penalties.

More information can be found in Chinese in these postings on [Announcement No. 70](#) and [Announcement No. 72](#).

## Approval of amendments to Annex A and Annex B of the Minamata Convention on Mercury (draft)

On 7 November 2025, China's Ministry of Ecology and Environment (MEE) issued a draft announcement to implement the National People's Congress Standing Committee's approval of amendments to Annex A and Annex B of the Minamata Convention on Mercury (Decision 5/4, adopted 28 October 2025). The draft sets out new control requirements for twelve mercury-added products, including mercury-containing batteries, and for polyurethane production processes that use mercury-based catalysts.

The Minamata Convention aims to eliminate new mercury mining, phase out existing mines, reduce mercury use in certain products and processes, control emissions and releases to the environment, and regulate artisanal and small-scale gold mining. The convention also covers the storage and disposal of mercury, cleanup of contaminated sites, and related health issues. Details on the mercury-added products and processes to be phased out, including timelines, are listed in Annexes A and B of the Convention.

The consultation was concluded on 17 November 2025. More information can be found in Chinese in this [posting](#) from MEE.

## Amendments regarding requirements for restricted use of hazardous substances in electrical and electronic products (draft)

GB 26572-2025 – requirements for restricted Use of hazardous substances in electrical and electronic products (EEP) – is the first amendment to the GB 26572-2011 standard since 2018. It aims to repeal, integrate, and refine the current substance and labeling standards (GB 26572-2011, including Amendment No. 1, and SJ/T 11364-2024) to closer align with the European Union RoHS Directive (2011/65/EU).

The standard includes scope, normative references, terms and definitions, classification of EEPs, limitation requirements, and labeling requirements. The standard contains the following appendices and lists:

- » Appendix A: Table A.1, which lists the hazardous substances restricted for use in EEPs and their limits
- » Appendix B: Logo graphic specifications for Mark I (Figure B.1) and Mark II (Figure B.2)
- » Appendix C: Logo definitions and color descriptions (interpretation of Symbol I and Symbol II)
- » Table 1: The classification of EEPs and requirements for the restricted use of hazardous substances
- » Table 2: Classification of detection units (EEP-A, EEP-B, EEP-C)
- » Table 3: Conformity determination rules
- » Table 4: Format of the information sheet for hazardous substances in EEPs

Electronic products are separated into two categories:

- » Category I are products that are included in the "Catalogue for Compliance Management of Restricted Use of Hazardous Substances in Electrical and Electronic Products," (the Catalogue) and they must comply with hazardous substance limits (10 substances), and mandatory labeling (including digital formats) requirements from SJ/T 11364-2024

- » Category II are products that are not included in the Catalogue, and they are encouraged to comply with substance limits, and must comply with labeling requirements

Labeling is mandatory, and digital labeling forms, such as QR codes, is introduced. Content about the disassembly of EEPs and typical disassembly examples from the GB 26572-2011 was deleted.

During the transition, companies may use either the older GB/T 26572-2011 (with or without its first amendment) or the new GB 26572-2025 until the end of 2025. From 1 January 2026 to 31 July 2027 only GB/T 26572-2011 (with its first amendment) or GB 26572-2025 may be used. From 1 August 2027 onward, all conformity assessments must follow GB 26572-2025. Products already assessed under GB/T 26572-2011 and still manufactured or imported after 1 January 2026 must switch to either the amended version or the new 2025 standard by 1 January 2027. Products assessed under the amended 2011 version and still in production after 1 August 2027 may transition to the 2025 standard naturally, such as through certificate renewal or product changes.

More information can be found [here](#) in Chinese. Information on GB 26572-2025 can be found [here](#) in Chinese.

## [India](#)

### Department of Chemicals and Fertilizers Order rescinds quality control orders for twenty substances (in force)

On 12 November 2025, the Ministry of Chemicals and Fertilizers (MCF) [withdrew the following fourteen Quality Control Orders](#) (QCO)<sup>1</sup>:

- » terephthalic acid (CAS No. 100-21-0) - S.O. 5437(E), 24 December 2021
- » ethylene glycol (CAS No. 107-21-1) - S.O. 5435 (E), 24 December 2021
- » 100% polyester spun, grey and white yarn - S.O. 3195(E), 17 July 2023
- » polyester industrial yarn - S.O. 1652(E), 5 April 2022
- » polyester staple fibers - S.O. 1651(E), 5 April 2022
- » polyester continuous filament fully drawn yarn - S.O. 3193(E), 17 July 2023
- » polyester partially oriented yarn - S.O. 3194(E), 17 July 2023
- » polyethylene material for moulding and extrusion - S.O. 1647(E), 5 April 2022
- » acrylonitrile butadiene styrene (CAS No. 9003-56-9) - S.O. 3927(E), 13 September 2021
- » polypropylene (CAS No. 9003-07-0) materials for moulding and extrusion - S.O 921 (E), 26 February 2024
- » polyvinyl chloride (CAS No. 9002-86-2) homopolymers - S.O 920 (E), 26 February 2024
- » ethylene vinyl acetate (CAS No. 24937-78-8) copolymers - S.O. 1643(E), 5 April 2022
- » polyurethanes - S.O. 3931(E), 13 September 2021
- » polycarbonate - S.O. 3930(E), 13 September 2021

On 20 November 2025, the MCF [withdrew the following six QCOs](#) (QCO)<sup>2</sup>:

- » pyridine (CAS No. 110-86-1) - S.O. 1890(E), 16 June 2020
- » beta picoline (CAS No. 108-99-6) - S.O. 1892(E), 16 June 2020
- » sodium tripolyphosphate (CAS No. 7758-29-4) - S.O. 1903(E), 16 June 2020
- » H acid (CAS No. 90-20-0 for the free acid; salts may vary) - S.O. 4925(E), 14 November 2024

<sup>1</sup> The withdrawal entered into force on the same day of publication; 12 November 2025.

<sup>2</sup> The withdrawal entered into force on the same day of publication; 20 November 2025.

- » K acid - S.O. 4926(E), 14 November 2024
- » vinyl sulphone - S.O. 4927(E), 14 November 2024

QCOs are gazette orders issued pursuant to Section 16 of the Bureau of Indian Standards (BIS) Act, 2016. They are issued to announce that relevant standards prescribed by the BIS concerning certain products will be mandatory effective from the date specified in the QCO. QCOs apply to products/articles (objects whose function is determined by their shape, surface, or design to a greater degree than their chemical composition). These orders require anyone handling the products/articles, including companies manufacturing or importing and downstream users, to comply with the requirements set out in the QCOs or face a ban. The requirements may be included from Indian Standards covered by the QCO - handling, packaging, and marking requirements; and sampling methods and tests for substances contained in products/articles. By the issuance of QCOs, the use of Standard Mark under a License or a Certificate of Conformity from BIS is mandated.

As these QCO have been withdrawn, none of their requirements apply. The withdrawal entered into force on the same day of publication: 12 November 2025.

## Revisions on the standards to use amino resins in paints and nickel formate in nickel catalysts for use in the hydrogenation of oils (consultation)

On 10 December 2025 and 16 December 2025, India's Bureau of Indian Standards (BIS) published draft revisions on the standards for the use of amino resins in paint and nickel formate (CAS No. 3349-06-2) in nickel catalysts for the hydrogenation of oils, respectively.

The [draft revision for amino resins](#) proposes on introducing stricter limits on heavy metal and lead in amino resins, packing and labeling requirements, and storage requirements. IS 15365 is an Indian Standard that establishes technical specifications and limits for amino resins used in paints, and the draft represents its second revision with the following requirements:

- » amino resins should not be manufactured using mercury and mercury-containing compounds, cadmium, chromium VI, arsenic, antimony and their oxides, and states that products should not contain more than 0.1% (w/w) of these heavy metals in total, whether introduced during manufacturing or as natural impurities
- » the maximum lead limit is 90 parts per million
- » classification must be either n-butylated urea formaldehyde resins, n-butylated melamine formaldehyde resins, or methylated melamine formaldehyde resins in the surface coating industry
- » amino resins are to be stored at ambient temperatures between 21-38°C to maintain their prescribed characteristics for at least six months after manufacture.
- » amino resins should be packaged in clean dry containers, with the following details clearly labeled:
  - name of material
  - manufacturer's name and trademark if any
  - type or grade of material
  - lead content (maximum)
  - toxic heavy metals content
  - mass of material
  - batch and lot number in code or otherwise
  - month and year of manufacture
  - a cautionary note, such as "Keep out of reach of children" and "This product may be harmful if swallowed or inhaled"

IS 8325 is the Indian Standard that specifies quality and purity requirements for nickel formate used in nickel catalysts, and this draft represents its second revision. The [revision](#) proposes that nickel formate should be supplied as green-colored fine crystals or finely ground powder, and sets out maximum limit values for the substances in nickel formate including:

- » nickel: min % by mass = 30.92%
- » iron: max % by mass = 0.05%
- » zinc: max % by mass = 0.01%
- » lead: max % by mass = 0.01%
- » copper: max % by mass = 0.02%
- » pH: min = 2.0
- » acid insoluble in water: max % by mass = 0.20%
- » sulphate: max % by mass = 0.20%

The revision also sets out packing and labeling requirements for nickel formate, including:

- » name of material
- » net mass
- » year of manufacture
- » name of manufacturer or trademark if any
- » batch number to enable the lot of the manufacturer to be traced from the records

Comments can be provided by 5 February 2026 and 10 February 2026 for amino resins in paints and nickel formate in nickel catalysts, respectively.

## Japan

### Designation of three substances as Class I Specified Chemical Substances per decisions of the 12th Conference to the Parties to the Stockholm Convention (consultation)

Following the decisions of the 12th Conference of the Parties (COP-12) to the Stockholm Convention on Persistent Organic Pollutants (POPs), on 18 December 2025, Japan opened a [consultation](#) which proposes to designate the following chemicals and chemical groups as Class I Specified Chemical Substances under the Chemical Substances Control Law (CSCL):

- » chlorpyrifos (CAS No. 2921-88-2)
- » chlorinated paraffins with carbon chain lengths in the range C14–17 and chlorination levels at or exceeding 45% chlorine by weight
- » long-chain perfluorocarboxylic acids (PFCAs), their salts, and related compounds (those with carbon chain lengths in the range C9–21)

The fundamental aim of this amendment is to fulfill Japan's obligations under the Stockholm Convention, 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, chemicals 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.

A number of products are prohibited from being imported when these chemical substances are used in them. Products in which chlorpyrifos is used include wood insecticides.

Products in which chlorinated paraffins with carbon chain lengths in the range C14–17 and chlorination levels at or exceeding 45% chlorine by weight are used include:

- » plasticizers for resin
- » prepared additives for flame-retardant treatment for textiles, resin, and rubber
- » lubricating, cutting, and hydraulic oils
- » paints
- » adhesives and sealing filler
- » water-repellent and fabric protection agents

Products in which long-chain PFCAs, their salts and related compounds (those with carbon chain lengths in the range C9–21) are used include:

- » professional-use photographic films
- » lubricating oils
- » paints
- » water-repellent and oil-repellent
- » adhesives and sealing filler
- » fire extinguishers, fire-extinguishing agents, and fire-extinguishing foam
- » waxes
- » water-repellent textiles and oil-repellent textiles
- » water-repellent clothes and oil-repellent clothes
- » water-repellent floor coverings and oil-repellent floor coverings

Comments can be provided until 6 February 2026. More information can be found [here](#).

## Philippines

### Fifty-nine chemicals to be added to the Philippine Inventory of Chemicals and Chemical Substances (consultation)

On 14 November 2025, the Department of Environment and Natural Resources published a [Draft Administrative Order](#) titled “2025 List of Additional Chemicals to be Included in the Philippine Inventory of Chemicals and Chemical Substances (PICCS)”. The draft Order proposes to update the PICCS for 2025 by listing 59 new chemicals that have been notified for use in the Philippines through the Pre-Manufacture Pre-Importation Notification system.

The draft identifies each new substance by its CAS Registry Number and notified chemical name. The draft states that the Order will take effect fifteen days after its publication in a newspaper of general circulation and after acknowledgement of receipt of a copy by the Office of the National Administrative Register.

## Singapore

### MyEHS System becomes the new platform for notification and registration of environmentally hazardous substances (published)

On 10 November 2025, the Ministry of Natural Resources and Environmental Sustainability [announced](#) that the current platform for notification and registration of environmentally hazardous substances (EHS) is now the digital MyEHS System. This has replaced the previous Environmentally Hazardous Substances Notification and Registration (EHSNR) Scheme.

The [MyEHS system](#) aims to collect information about the identity, hazard classification, and amounts of EHS placed on the market from importers, exporters, and manufacturers of EHS based in Malaysia. This information will be used to establish the EHS Risk Prioritization List for further risk assessment. There is no minimum quantity threshold.

The EHS Reference List, for which notification will be required, consists of:

- » Annex III of the Rotterdam Convention
- » Annexes A, B, and C of the Stockholm Convention
- » chemicals controlled under the Minamata Convention
- » Annex I and V of European Union Regulation (EU) No 649/2012 (a.k.a., EU PIC Regulation)
- » other substances that are considered substances of concern as determined by the Director General

There are limited exemptions listed under the [MyEHS frequently asked questions](#), which include substances for which information is already submitted to government agencies under other legislation.

There are no penalties associated with this update.

## [South Korea](#)

### [Updates to K-REACH hazard assessment lists for new and existing substances \(consultation\)](#)

On 10 November 2025, a [draft amendment](#) (can also be found [here](#) in Korean) was published to update K-REACH hazard assessment lists for new and existing substances in accordance with the Chemical Substance Registration and Evaluation Act. The amendment aligns changes to toxic substance classification under the Chemicals Control Act (CCA) which took effect in August 2025. Public consultations were open until 1 December 2025.

Acute hazardous substances to humans now include skin corrosive categories 1A, 1B and 1C (previously only 1A). As a result, 75 substances within categories 1B and 1C (56 new, 19 existing) that were previously considered non-toxic fall under the category of Acutely Hazardous Substances.

Additional updates include:

- » new hazard assessment results published for 123 substances (43 new, 80 existing)
- » 23 items revised based on new hazard data (21 new, 2 existing)
- » 2 new substances added to category 1A

[Annex 1](#) (can also be found [here](#) in Korean) includes the List of New Substances, [Annex 2](#) (can also be found [here](#) in Korean) includes the List of Existing Substances. Both include registration numbers, chemical names and CAS numbers, marking requirements, physico-chemical properties, and hazard classifications.

## [Taiwan](#)

### [Amendments to the “Announcement on the Control of Toxic Chemical Substances and Their Operation and Management” \(consultation\)](#)

Taiwan has published a draft amendment to the “Announcement on the Control of Toxic Chemical Substances and Their Operation and Management” adding and updating the status of the below substances, given changes to the Stockholm Convention, the Minamata Convention, and US Final Risk Management Rules for tetrachloroethylene. The amendments include:

- » methoxychlor (CAS Nos. 72-43-5, 30667-99-3, 76733-77-2, 255065-25-9, 255065-26-0, 59424-81-6, 1348358-72-4) added to the list of Class I, Class III, and Class IV toxic chemicals with a controlled concentration of 0.1%

- » Dechlorane Plus (CAS No. 13560-89-9), its syn-isomer (CAS No. 135821-03-3), and anti-isomer (CAS No. 135821-74-8) added to the list of Class I and Class IV toxic chemicals, with a controlled concentration of 0.1%
- » UV-328 (CAS No. 25973-55-1) added to the list of Class I and Class IV toxic chemicals, with a controlled concentration of 0% or detection limit
- » tetrachloroethylene (CAS No. 127-18-4) is now prohibited from use in cleaning agents
- » mercury's (CAS No. 7439-97-6) prohibited operations and permitted uses have been revised

A transitional period of one to one and a half years for enforcement will be set up for existing operators. A consultation was open until 5 January 2026. More information can be found [here](#) in Chinese.



## EUROPE

### European Union

#### Amendments to Directive 2011/65/EU on the restriction of certain hazardous substances in electrical and electronic equipment (published)

The European Commission (EC) published two directives that amend Directive 2011/65/EU on the restriction of certain hazardous substances in electrical and electronic equipment (EEE), commonly referred to as RoHS 2. RoHS 2 expanded the scope of products covered in the original directive and imposed new obligations on EEE manufacturers.

[Directive \(EU\) 2025/1802](#) extends an exemption of using lead in high melting temperature solders (lead-based alloys containing 85 % by weight or more lead). The directive introduces an amendment to Annex III of Directive 2011/65/EU, splitting 7(a) into additional sub-entries. High melting temperature type solders can contain up to 85% of lead. Individual substitutes and alternatives are partly available, lead-free solutions will not be available or be only available with insufficient reliability for all relevant applications, in the next three years. The original exemption set out in point 7(a) of Annex III to Directive 2011/65/EU expires on 30 June 2027. The newly introduced, application-specific sub-entries (7(a)-I through 7(a)-VII), which cover specific uses like internal interconnections, die attach, and hermetic sealing materials, are set to expire later, on 31 December 2027.

[Directive \(EU\) 2025/2364](#) amends Directive 2011/65/EU and extends exemptions for using lead as an alloying element in steel, aluminum, and copper. Previously, the EC granted temporary extensions with specific concentration limits and varying expiry dates. Changes introduced by the directive include amended concentration limits and the following new expiry dates:

- » 11 December 2026
- » 11 June 2027
- » 30 June 2027

The exemption can apply only if the manufacturer demonstrates that the rate of lead release does not exceed 0.05  $\mu\text{g}/\text{cm}^2$  per hour. Both directives are effective from 11 December 2025. There are no penalties associated with these updates.

## Temporary suspension of the requirement for packaging producers to appoint an authorized representative in each European Union Member State (published)

On 10 December 2025, the European Commission [announced](#) a temporary suspension of the requirement for packaging producers to appoint an authorized representative in each Member State to comply with packaging extended producer responsibility (EPR) obligations. The suspension applies until 1 January 2035 and is part of the Commission's environmental "omnibus" simplification package aimed at reducing administrative burdens, particularly for small and medium-sized enterprises. The measure does not amend the core provisions of European Union (EU) packaging legislation, including the Packaging and Packaging Waste Regulation, which remains in force.

The suspension is introduced through the Commission's environmental omnibus package and affects the practical implementation of packaging EPR obligations related to registration, reporting, and fee payments. During the suspension period, packaging producers are no longer required to appoint an authorized representative in each Member State. Producers may choose to either appoint an authorized representative or fulfil EPR registration, reporting, and fee-payment obligations directly. The Commission estimates this flexibility could generate annual cost savings of approximately €300 million for industry.

The suspension is intended as an interim measure ahead of a broader reform of EU EPR rules, with a comprehensive legislative proposal expected in 2026. There are no penalties associated specifically with this suspension, although enforcement of underlying EPR obligations continues under EU and national law.

More information can be found in this [question/answer posting](#) from the EC.

## Regulation (EU) 2025/2365 on preventing plastic pellet losses at all stages of the plastic pellet supply chain (in force)

The European Union (EU) published new [Regulation \(EU\) 2025/2365](#) aiming to reduce pollution caused by plastic pellets; it lays down obligations for the handling of plastic pellets to prevent losses at all stages of the plastic pellet supply chain, with the aim of achieving zero plastic pellet losses. The regulation applies to:

- » economic operators handling plastic pellets in the EU in quantities equal to or above a threshold of five tonnes in the previous calendar year
- » economic operators operating installations in the EU for the cleaning of plastic pellet containers and tanks
- » EU carriers and non-EU carriers transporting plastic pellets in the EU
- » shippers, operators, agents, and masters of seagoing vessels transporting plastic pellets in freight containers leaving or calling at a port of a Member State

The main obligations are:

- » economic operators, EU carriers, and non-EU carriers shall ensure that losses of plastic pellets are avoided, and ensure that when a loss occurs, immediate action is taken to contain and clean up those losses
- » economic operators shall notify the competent authorities of the Member State about each installation located in that Member State which they operate or control:
  - for each installation notified, they shall specify whether the installation handles plastic pellets in quantities below, or equal to or above, a threshold of 1 500 tonnes per year
  - they must establish a risk management plan in accordance with Annex I
- » before the transport of plastic pellets in the EU for the first time, EU carriers or authorized representatives shall notify the competent authorities of the Member State; they must ensure that the actions set out in Annex III are implemented

- » economic operators, EU carriers, and authorized representatives shall notify the competent authorities of any changes to their circumstances, keep records of annually estimated quantities of losses and of the total quantities of plastic pellets handled, and ensure their staff is properly trained

Economic operators must certify that the handling process at each installation handling plastic pellets in quantities equal to or above a threshold of 1,500 tonnes is compliant with Annex I:

- » by 17 December 2027, and every three years thereafter, for large enterprises
- » by 17 December 2028, and every four years thereafter, for medium-sized enterprises
- » by 17 December 2030, and every five years thereafter, for small enterprises

Certifications must follow the model form set out in Annex IV and be in electronic form. Member States are required to set national penalties for non-compliance; the framework for these penalties is set out in Article 20.

This Regulation applies from 17 December 2027. However, Article 3(1), Article 5(6), second subparagraph, Article 16, Article 17(1), and Article 18(2) and (3) shall apply from 16 December 2025. And Article 1(2), point (d), Article 12, Article 13(1), Article 17(2) and (3) and Article 19 shall apply, as far as shippers and operators, agents and masters of seagoing vessels are concerned, from 17 December 2028.

## Regulation setting out the timing, management, and detailed rules for auctioning allowances under the second European Union Emissions Trading System (consultation)

On 8 December 2025, the European Commission opened a [feedback period for a draft delegated regulation](#) setting out the timing, management, and detailed rules for auctioning allowances under the second European Union (EU) Emissions Trading System (ETS2). The consultation closed on 5 January 2026.

The initiative seeks to amend the existing Auctioning Regulation following revisions to the EU Emissions Trading System (EU ETS) Directive adopted under the “Fit for 55” climate package, which established ETS2 as a separate carbon market covering certain sectors. The draft regulation was published to collect input from registered stakeholders, which will be considered before the rules are finalized.

The EU ETS is the EU’s main carbon-pricing mechanism, setting a cap on greenhouse gas emissions and allowing companies to trade emission allowances. The “Fit for 55” package is a broad set of EU climate laws introduced to ensure the EU reduces net greenhouse gas emissions by at least 55% by 2030 compared to 1990 levels.

## Restriction on use of certain non-polymeric aromatic brominated flame retardants (draft)

On 12 December 2025, the European Chemicals Agency (ECHA) [updated](#) the registry of restriction intentions until outcome to record the intention to restrict the placing on the market of electrical and electronic equipment, construction products, and textile products containing certain non-polymeric aromatic brominated flame retardants. The proposal aims to significantly reduce emissions of these flame retardants, following an investigation report published on 18 December 2024 which indicated that the substances pose a burden to the environment due to persistent, bioaccumulative, and toxic or very persistent and very bioaccumulative properties. The report identified the waste stage, particularly shredding and landfilling, as the key contributor to releases. ECHA is preparing this Annex XV restriction dossier following a request received from the European Commission on 12 November 2025.

## Update to the CLP Regulation EC No 1272/2008 (consultation)

On 27 November 2025, the European Commission (EC) issued [two draft Delegated Regulations](#) to update Annex VI of the CLP<sup>3</sup> Regulation (EC) No 1272/2008. The updates introduce new harmonized classifications and modify existing ones for numerous substances based on the European Chemicals Agency Committee for Risk Assessment (RAC) opinions issued in 2023 and 2024. Substances impacted should be reviewed by the proposed classifications and comments can be submitted by 26 January 2026.

The CLP Regulation aims to ensure high protection of human health and the environment and support the free circulation of chemicals by maintaining a harmonized list of classified substances. These amendments reflect the latest scientific assessments, public consultation feedback and Member State expert input (CARACAL). Updates occur regularly following RAC opinions. The EC is legally required under Article 37(5) of the CLP Regulation to adopt updates without undue delay.

The draft acts amend [Annex VI](#), Part 3, Table 3 (list of harmonized classifications and introduce a new Note 13 related to group entries (bromides) to allow hazard additivity for substances sharing a common toxicological moiety. In addition, there are updates to several chemical names for clarity. The amendments consist of a long list of substances for which CLH will be introduced or updated, based on RAC opinions (examples include flazasulfuron, PFHxA salts, lithium salts, borates, thymol, methyl methacrylate, penconazole, etc.).

The proposal adds new CLH classifications for over forty substances; updates existing classifications in Annex VI; excludes certain substances where evidence is insufficient (e.g., rapeseed oil; fosthiazate reproductive toxicity pending further review); and adds Note 13 for group entries of bromide salts (calcium bromide, potassium bromide, sodium bromide) to apply the principle of concentration additivity due to a shared toxicological constituent.

Suppliers will need to update safety data sheets, labels, packaging, hazard communication and ensure downstream compliance. Products already classified must be updated within the 18-month transition period. Voluntary early implementation is allowed immediately after entry into force.

The amendments modernize CLP Annex VI in line with the latest RAC opinions and scientific data. Companies will be required to comply 18 months after the regulation applies, with early voluntary compliance permitted.

## Standardized formats and technical specifications for battery labeling (consultation)

The European Commission has launched a [consultation](#) (comments due by 26 January 2026) on a draft implementing regulation laying down rules for the application of Regulation (EU) 2023/1542, which establishes standardized formats and technical specifications for battery labeling across the European Union (EU). The draft regulation outlines mandatory requirements for displaying general information, capacity, and chemical composition, while also introducing a specific carbon footprint label for high-capacity batteries.

Regulation (EU) 2023/1542 is a comprehensive EU law adopted in July 2023 that sets out sustainability, safety, labeling, waste management and lifecycle requirements for all batteries and waste batteries placed on the EU market, replacing the older Batteries Directive (2006/66/EC) and aiming to promote a circular economy and reduce environmental impact.

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<sup>3</sup> i.e., classification, labeling, and packaging.

A hierarchy for marking requirements is defined in the draft regulation to ensure that critical safety symbols and disposal icons remain visible even on compact surfaces. These measures aim to harmonize how battery data is presented to consumers and professionals, supporting the broader circular economy and sustainability goals.

## Call for data and information that will be used to assess the impact of establishing new Occupational Exposure Limit values (OELs) for seven substances (consultation)

On 8 September 2025, the European Commission, Directorate General for Employment, Social Affairs and Inclusion began a [targeted consultation](#), contacting known stakeholders, to collect data and information that will be used to assess the impact of establishing new Occupational Exposure Limit values (OELs) for seven substances, with feedback due on 12 January 2026. The seven substances classified as carcinogenic, mutagenic, or reprotoxic (CMR) are:

- » 1,2-dichloropropane (CAS No. 78-87-5)
- » 1,2,3-trichloropropane (CAS No. 96-18-4)
- » 2-chloro-1,3-butadiene (CAS No. 126-99-8)
- » 2,3-epoxypropyl methacrylate (CAS No. 106-91-2)
- » nitrosamines
- » respirable crystalline silica
- » chromium VI compounds

The resulting assessments may be used to support future amendments to the Directive 2004/37/EC on the protection of workers from the risks related to exposure to CMR substances at work.

## Delegated act for exemptions from the reuse obligations for plastic wrappings and straps under the Packaging and Packaging Waste Regulation (draft)

The European Commission has introduced a [delegated act](#) under the Packaging and Packaging Waste Regulation to establish exemptions from reuse obligations for specific plastic wrappings and straps (comments due on 9 January 2026). These exemptions are designed for cases where reuse requirements would be technically or economically impractical, particularly for materials used to secure goods during transport. The initiative seeks to balance environmental objectives with operational feasibility in packaging and logistics processes. No specific entry-into-force date or additional timelines are detailed in the initiative.

## The European Financial Reporting Advisory Group provides its technical advice on draft simplified European Sustainability Reporting Standards to the European Commission (consultation)

The European Financial Reporting Advisory Group (EFRAG) has submitted its [technical advice](#) to the European Commission regarding the draft simplified European Sustainability Reporting Standards (ESRS). These simplified standards are intended to ease reporting requirements for small and medium-sized enterprises while maintaining alignment with the Corporate Sustainability Reporting Directive. These updates introduce greater flexibility, targeted reliefs, phasing-in provisions, and a 61% reduction in mandatory datapoints (with all voluntary disclosures removed). Key enhancements include a streamlined materiality assessment, more principles-based narrative requirements for policies, actions, and targets, flexibility in value chain data estimates, and improved interoperability with the International Sustainability Standards Board standards while preserving the European Union Green Deal objectives.

EFRAG submitted its technical advice and published the draft simplified ESRS on 3 December 2025. The European Commission will now prepare a delegated act to revise the original ESRS Set 1, with no specific adoption or entry-into-force dates outlined in the available information. EFRAG has also launched the [ESRS Knowledge Hub](#) on 4 December 2025 to support implementation.

## Updates to Regulation EU 2019/1021 on persistent organic pollutants to implement decisions under the Stockholm Convention (consultation)

The European Commission has launched three related draft delegated regulations under Regulation (EU) 2019/1021 on persistent organic pollutants (POPs) to implement decisions under the Stockholm Convention. The Stockholm Convention is a global treaty that aims to protect human health and the environment from POPs.

Each initiative concerns a different substance group that has been decided for listing under the Stockholm Convention, namely:

- » [chlorpyrifos](#) (CAS No. 2921-88-2)
- » [medium-chain chlorinated paraffins](#) (CAS No. 85535-85-9, 198840-65-2, 1372804-76-6, and others)
- » [long-chain perfluorocarboxylic acids](#), their salts and related compounds (CAS No. 375-95-1, 335-76-2, 2058-94-8, 307-55-1, 72629-94-8, 376-06-7, 141074-63-7, 67905-19-5, 57475-95-3, 16517-11-6, 133921-38-7, 68310-12-3 and others)

For each of these groups, the drafts propose to amend Annex I to the POPs Regulation to include the relevant substances as substances subject to certain restrictions in the EU, thereby aligning EU law with the corresponding Stockholm Convention listings.

Stakeholders were invited to provide feedback on the draft texts from 21 November 2025 to 19 December 2025. The EC plans to take this feedback into account when finalizing the delegated acts for adoption in 2026.

## France

### Decree No. 2025-1081 extending obligations for producers of packaging and package products to promote circular economy (published)

On 18 November 2025, France's Ministry of Ecological Transition, Biodiversity, and International Negotiations on Climate and Nature published Decree No. 2025-1081, which amends the Code of the Environment in accordance with Law No. 2020-105 of 10 February 2020. This law, known as the Anti-Waste Law for a Circular Economy, passed in February 2020 with the aim of promoting a circular economy and combating waste across all sectors.

The Decree implements the extended producer responsibility (EPR) obligations for producers (manufacturers, importers, and distributors) of packaging and package products used or consumed in commercial non-domestic (professional) activity in accordance with Law No. 2020-105. It aims to ensure that producers contribute to, or provide for the collection, reuse, and recycling of this waste to promote a circular economy. The Decree primarily operates by modifying and completing specific sections and articles within Title IV of Book V of the Code of the Environment.

Producers are obligated to contribute financially to, or directly provide for, the collection, reuse, and recycling of waste generated by professional packaging. This decree establishes the role of a government approved eco-organization, which is

established and funded by producers to assume those EPR obligations (as detailed in Article L. 541-10 of the French Environmental Code). The eco-organization must financially cover the costs incurred by those who manage packaging waste produced by professionals. On the other hand, to qualify for cost coverage, professionals must demonstrate that this waste is not already being handled by local authorities and must adhere to specific sorting requirements.

The following are exempted from EPR obligations for professional waste: packaging and waste from mineral or synthetic oils, hazardous chemical products, specified construction sector materials, or specified agro-supply packaging. These are covered by separate legislation.

The decree came into force on 1 January 2026. Contracts already in place on that date may continue until they expire. There are no new penalties associated with this decree, however penalties for failure to comply with EPR obligations are set out in the Article L.541-9-5 of the French Environmental Code, such as fines.

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

## Germany

### Packaging Law Implementation Act (consultation)

Germany released a draft Packaging Law Implementation Act (i.e., VerpackDG), which will replace the existing Packaging Act (i.e., VerpackG) to align national rules with the European Union (EU) Packaging Regulation entering into force in August 2026. The proposal aims to strengthen waste prevention, increase recycling quotas for key materials, and introduce broader licensing and financing obligations for entities placing packaging on the market. The new law intends to build on and refine the structures already established under the current German packaging regime. Consultation with federal states and associations runs until 5 December 2025, followed by planned Cabinet approval in early 2026. The new law will support the application of the EU Packaging Regulation from August 2026.

More information can be found in German [here](#) and in this [press release](#).

## Ireland

### Updates to the Clean Air Strategy (consultation)

The Department of Climate, Energy and the Environment has launched a [public consultation](#) to update Ireland's Clean Air Strategy, originally published in 2023. The strategy aims to ensure continued reductions in air pollution emissions and compliance with stringent health-based targets set by the World Health Organization. Updating the strategy seeks to incorporate new actions that deliver sustained improvements in air quality, with anticipated benefits such as cleaner air, warmer homes, better health, and lower carbon emissions, supporting a long-term sustainable economy. The consultation invites feedback on what is working, what is not, and how the strategy can be improved to remain fit for purpose.

Manufacturing and maintenance facilities with emissions may be impacted by tighter air quality standards, requiring improved controls and monitoring. Supply chain partners could face stricter compliance obligations, especially for government contracts linked to environmental performance. However, these changes align with broader environmental, societal, governmental, and sustainability reporting frameworks that aerospace and defense firms increasingly adopt. The consultation opened on 20 November 2025 and closes on 20 February 2026.

## Poland

### Act to prohibit the use of products containing asbestos (published)

On 5 December 2025, the Marshal of the Sejm of the Republic of Poland published in the Journal of Laws (2025, [item 1708](#)) the consolidated text of the Act on the prohibition of the use of products containing asbestos. The notice, dated 27 November 2025, integrates into a single up to date version the amendments introduced by the Act of 20 March 2025 on the labor market and employment services, together with other changes resulting from provisions announced before 26 November 2025.

The consolidated law clarifies that the term asbestos covers only six specified fibrous silicates, each identified by its CAS registry number:

- » chrysotile asbestos (CAS No. 12001-29-5)
- » crocidolite asbestos (CAS No. 12001-28-4)
- » amosite (grunerite) asbestos (CAS No. 12172-73-5)
- » anthophyllite asbestos (CAS No. 77536-67-5)
- » tremolite asbestos (CAS No. 77536-68-6)
- » actinolite asbestos (CAS No. 77536-66-4)

The Act maintains the prohibition on producing products containing asbestos and, by reference to Annex XVII to Regulation (EC) No 1907/2006 (REACH), maintains restrictions on the placing on the market and use of products containing these asbestos types. It allows narrow derogations for certain existing industrial components, such as diaphragms in electrolytic installations and chrysotile asbestos shafts used for drawing glass that were installed or in use before 1 January 2005, and only until they are used up or replaced with asbestos-free alternatives.

The asbestos law continues to require safe handling, removal and disposal of asbestos and products containing asbestos, and provides for criminal penalties where its prohibitions are breached, including a fine, restriction of liberty or imprisonment for a period of three months to five years.

### Consolidated text of the Act on the greenhouse gas emission allowance trading scheme (published)

On 3 December 2025, Poland announced the publication of the consolidated text of the [Act of 12 June 2015 on the greenhouse gas emission allowance trading system in Poland](#) (can also be found [here](#) in Polish), reflecting the legal status as of 7 November 2025. The text specifically states that this includes all provisions promulgated before 4 November 2025. This is meant to facilitate the readability of the Act, already in force, which governs emissions from installations and aviation operations.

The Act is the national law implementing Directive 2003/87/EC (ETS Directive), establishing the rules of the European Union emissions trading system (EU ETS) in Poland, and is continually amended to both transpose new EU directives, regulations, and decisions, as well to incorporate other Polish legislation. The EU ETS is a mandatory cap-and-trade market mechanism that sets a gradually lowering limit on the total amount of greenhouse gases that can be emitted by installations in key sectors (power generation, heavy industry, and aviation), forcing them to buy or trade allowances for every tonne of CO<sub>2</sub> they release.

The regulation mandates that operators of specified installations obtain a permit for greenhouse gas emissions and that aircraft operators have an approved emissions monitoring plan. Annex I defines the types of activities, capacity thresholds,

and specific greenhouse gases that determine mandatory participation in the ETS for operators of installations. Operators in these activities have monitoring and annual reporting obligations.

The most recent amendment included in the consolidated text is the Act of 21 February 2025 regarding biocomponents and liquid biofuels which changes the criteria under which emissions from biofuels may count as zero-emission. The most recent EU transposition in this consolidated Act is Commission Implementing Regulation (EU) 2020/1001 which governs the operation of the Modernization Fund.

Penalties for non-compliance include an administrative fine of 50,000 PLN for operating an installation without a permit (operating without an approved monitoring plan for aircraft operators) and for failing to submit verified reports. Additionally, a penalty equivalent to 100 EUR per tonne of CO<sub>2</sub> applies for failure to surrender sufficient emission allowances by the deadline.

## Amendments to the Act on Waste Electrical and Electronic Equipment and certain other acts (draft)

On 8 December 2025, the Ministry of Climate and Environment created a [draft act](#) (can also be found [here](#) in Polish) amending the Act of 11 September 2015 on Waste Electrical and Electronic Equipment (WEEE), as well as the Acts on the recycling of end-of-life vehicles, waste, and the management of packaging and packaging waste, to implement the third subparagraph of Article 8a(5) of Directive (EU) 2018/851 and Directive (EU) 2024/884 on waste electrical and electronic equipment.

For WEEE, the draft clarifies which entity introducing equipment is responsible for financing the collection and processing of waste equipment from households and from users other than households, using specific date cut-offs and distinguishing between equipment listed in Annex 6, photovoltaic panels, and other equipment. For end-of-life vehicles, it defines factory remanufacturing and sets conditions under which removed parts destined for factory remanufacturing are not considered waste, including storage, documentation, and transport requirements.

Across the waste and packaging framework, the draft introduces a system of authorized representatives for entities established in other European Union Member States that introduce vehicles or packaged products onto the Polish market, and expands the national register obligations so that authorized representatives and the entities they represent, together with relevant contract and volume information, are properly recorded.

The draft stipulates that the Act will enter into force 14 days after its publication.



## NORTH AMERICA

### Canada

#### Addition of two substances to the Non-domestic Substances List (published)

The Canadian Environmental Protection Agency, under the Canadian Environmental Protection Act (CEPA), published [Order 2025-66-11-02](#) on 13 December 2025, which amends the Non-domestic Substances List (NDSL) under subsection 66(2) by adding:

- » fatty acids, C18-unsatd., dimers, oligomeric reaction products with fatty acids, C16-18 and C18-unsatd., branched and linear and triethylenetetramine (CAS No. 157707-72-7) to Part I of the NDSL
- » alkenoic acid-, alkyl ester, reaction product with glycerol trioleate and sulfur (numerical order: 19796-4) to Part II of the NDSL

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.

The NDSL is divided into parts including:

- » Part I: chemicals and polymers that are identified by their CAS no.
- » Part II: chemicals and polymers that are identified by masked names and Confidential Accession Numbers (CANs) due to the substances being considered as confidential business information.

The amendment entered into force on 13 December 2025. There are no penalties associated with the update.

#### Updated human health risk characterizations for triphenyl phosphate, tris(2-butoxyethyl) phosphate, hydrogenated didecene, and hydrogenated trimer and tetramer of decene (consultation)

On 22 November 2025, the Environment and Climate Change Canada (ECCC) together with Health Canada published an updated human health risk [characterization document](#) for the flame-retardant substances triphenyl phosphate (TPHP; CAS No. 115-86-6) and tris(2-butoxyethyl) phosphate (TBOEP; CAS No. 78-51-3). Additionally, on the same day, a [final screening assessment](#) for the decenes group, covering hydrogenated didecene (CAS No. 68649-11-6) and hydrogenated trimer and tetramer of decene (HTTD; CAS No. 68649-12-7) was published.

The assessment for TPHP and TBOEP concluded that these substances may pose a danger to human health under certain exposure conditions, and therefore meet the criteria set out in paragraph 64(c) of the Canadian Environmental Protection Act (CEPA).<sup>4</sup> The assessment for hydrogenated didecene and HTTD concluded that these substances meet the criteria in

<sup>4</sup> CEPA sets out Canada's system for evaluating chemicals that may pose risks to human health or the environment. It includes Schedule 1, the federal list of toxic substances, and can authorize the addition of new substances to the list following risk assessment.

paragraph 64(c) of CEPA, as they are entering or may enter the environment in quantities or under conditions that may pose a danger to human life or health. However, they were not found to meet the criteria in paragraphs 64(a) or 64(b), as they did not pose a risk to the environment. A corresponding Risk Management Approach was also issued, proposing their addition to Part 2 of Schedule 1 and prioritizing pollution prevention to reduce human exposure, particularly via inhalation.

ECCC opened a 60-day public consultation period from the date of publication for the TPHP and TBOEP human health risk characterization and the Risk Management Approach for hydrogenated didecene and HTTD, closing on 21 January 2026.

## Approach on the prioritization of chemicals in plastics (consultation)

Health Canada and Environment and Climate Change Canada developed an [approach](#) for the prioritization of chemicals in plastics in Canada. It includes reviewing chemicals with known or potential use in plastics in Canada and identifying those that need further attention based on hazard and potential for human and environmental exposure. It builds on the existing Identification of Risk Assessment Priorities framework, adding plastic-specific criteria like chemical function, the type of plastic matrix, and the likelihood of the substance being released.

Under the approach, 6,604 substances were identified within the scope and screened. The following summarizes key findings:

- » Eleven substances were identified as priorities under the Canadian Environmental Protection Act (CEPA), and included in CEPA's Plan of Priorities (see Table 2):
  - 1,4-benzenediamine, N,N'-diphenyl- (CAS No. 74-31-7)
  - phenol, 4,4'-(1-methylethylidene)bis- (CAS No. 80-05-7)
  - benzene, ethenyl- (CAS No. 100-42-5)
  - benzene, 1,4-dimethyl- (CAS No. 106-42-3)
  - benzene, dimethyl- (CAS No. 1330-20-7)
  - 4,7-methanoisobenzofuran-1,3-dione, 4,5,6,7,8,8-hexachloro-3a,4,7,7a-tetrahydro- (CAS No. 115-27-5)
  - phosphoric acid, 2-ethylhexyl diphenyl ester (CAS No. 1241-94-7)
  - benzene, 1,1'-(1,1,2,2-tetramethyl-1,2-ethanediyl)bis- (CAS No. 1889-67-4)
  - methanone, (2-hydroxy-4-methoxyphenyl)(2-hydroxyphenyl)- (CAS No. 131-53-3)
  - methanone, (2,4-dihydroxyphenyl)phenyl- (CAS No. 131-56-6)
  - methanone, (2-hydroxy-4-methoxyphenyl)phenyl- (CAS No. 131-57-7).
- » for 25 substances, additional hazard or exposure data gathering is recommended to determine their risk level (see Table 3).
- » 55 substances were identified for review of past CEPA assessment to determine if the risk management measures are sufficient
- » remaining 6,513 substances were determined not to be priorities for further action.

Results will be further updated as more information becomes available.

The Department of the Environment and Department of Health approved the outlined approach for future chemical prioritization and planning of assessment activities. Comments on the approach can be provided until 4 February 2026.

More information can be found in the [Canada Gazette](#).

## United States

### Significant New Use Rules on thirty-five chemical substances (24-4.5e) (published)

The United States Environmental Protection Agency (EPA) issued a [final rule](#) and is additionally proposing significant new use rules (SNURs) under the Toxic Substances Control Act (TSCA) for certain chemical substances that were the subject of premanufacture notices (PMNs) and are also subject to an Order issued by EPA pursuant to TSCA. The final rule was published on 4 November 2025 and will be effective from 5 January 2026.

Thirty-five substances are included. These SNURs require individuals or entities to notify the EPA 90 days prior to manufacturing or processing these substances for any designated significant new use. The affected chemical substances are listed under Subpart E—Significant New Uses for Specific Chemical Substances, refer to the source for activities designated as significant new uses for each of the substances. These SNURs identify as significant new uses any manufacturing, processing, use, distribution in commerce, or disposal that does not adhere to the restrictions already imposed by underlying TSCA Orders for these substances.

This requirement enables the EPA to evaluate the conditions of the intended use, make an appropriate determination, and implement any necessary actions before manufacturing begins. Penalties include imprisonment of up to 15 years and/or a fine of up to \$250,000; a convicted organization may be subject to a fine of up to \$1,000,000.

### Washington State expands restriction on per- and polyfluoroalkyl substances in consumer products (published)

Washington State's Department of Ecology (Ecology) adopted the [Safer Products for Washington \(SPW\) cycle 1.5 final rule](#), expanding restrictions on per- and polyfluoroalkyl substances (PFAS) in consumer products. The rule prohibits the manufacture, sale, and distribution of certain PFAS-containing products starting 1 January 2027. A de-minimis threshold of 50 parts per million (ppm) total fluorine has been introduced for both restrictions and reporting requirements. The rule builds on prior SPW measures targeting PFAS in fabrics, carpets, and textiles.

Prohibited categories from 1 January 2027 include:

- » automotive washes (except when PFAS is used as a propellant)
- » cleaning products for residential, commercial, and institutional use (excluding industrial-use-only products and pesticides)

Reporting required for intentional PFAS use in nine other categories from 1 January 2026, with annual reports due 31 January each year:

- » firefighting personal protective equipment
- » automotive waxes
- » floor waxes and polishes
- » hard surface sealers

Manufacturers may challenge the assumption of intentional PFAS addition above 50 ppm total fluorine with evidence. Initial reports have a deadline of 31 January 2027. Penalties for non-compliance include civil fines up to \$10,000 per violation for repeat offenses.

## Minnesota requires reporting of products containing intentionally added per- and polyfluoroalkyl substances sold in the state (adopted)

Minnesota has adopted a [final rule](#) requiring manufacturers to report products containing intentionally added per- and polyfluoroalkyl substances (PFAS) sold in the state and to pay a one-time reporting fee. The rule implements part of Minnesota's PFAS phaseout framework under Amara's Law,<sup>5</sup> which aims to reduce the use of persistent PFAS in consumer products and improve transparency across supply chains.

The rule establishes a [reporting and fee framework](#) administered by the Minnesota Pollution Control Agency and supported by an electronic reporting platform, the PFAS Reporting Information System for Manufacturers (PRISM). It sets out reporting content requirements, exemptions, fee provisions, update obligations, and confidentiality protections.

Under the final rule, manufacturers must submit an initial report covering all PFAS-containing products or components sold in Minnesota by 1 July 2026 and pay a one-time \$800 fee per manufacturer. PFAS-containing products introduced after that date must be reported by 1 February of the following year. Reports must include:

- » a description of the product or product category, with the option to group similar products
- » identification of all intentionally added PFAS
- » PFAS concentration ranges or total organic fluorine where individual PFAS levels are unknown
- » the function of each PFAS in the product or component
- » manufacturer contact information

Manufacturers within the same supply chain may submit a single report on behalf of multiple entities, provided documentation is retained and accuracy is verified. PFAS information from upstream suppliers must be retained for at least five years after products are removed from the supply chain.

The rule allows manufacturers to request a 90-day reporting extension for a \$300 fee and requires updates only when there is a significant change in PFAS type, concentration, or product portfolio. Fees will be adjusted for inflation starting 1 July 2027 and every odd-numbered year thereafter.

Certain products are exempt from reporting, including used products, products pre-empted by federal law, PFAS-regulated firefighting foams and food packaging, and products containing PFAS classified as federal confidential information. Trade secret protections apply to chemical identities and some supply chain information, although a PFAS subclass must still be disclosed publicly.

The rule was adopted on 8 December 2025, with initial reporting and fee payment due by 1 July 2026. The PRISM reporting platform is expected to be fully available in January 2026. Penalties for non-compliance may apply under Minnesota environmental enforcement provisions.

## Draft risk evaluation for 1,2-dichloroethane (consultation)

EPA has released a [draft risk evaluation](#) under the Toxic Substances Control Act (TSCA) for 1,2-dichloroethane (1,2-DCA; CAS 107-06-2) and is seeking public comment (due date of 20 January 2026). The purpose of TSCA risk evaluations is to assess whether a chemical substance poses an unreasonable risk to human health or the environment under its conditions of use,

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<sup>5</sup> Amara's Law establishes reporting as a transitional measure ahead of future prohibitions and currently unavoidable use determinations, which are addressed in a separate rulemaking process.

including potential risks to exposed or susceptible subpopulations identified by EPA, without considering costs or other non-risk factors. EPA has prepared this draft risk evaluation and preliminarily determined, based on the weight of scientific evidence, that 1,2-DCA presents an unreasonable risk to human health and the environment, primarily due to specific conditions of use analyzed in the evaluation.



## OCEANIA

### Australia

#### Five chemicals added to Australian Industrial Chemicals Introduction Scheme inventory (effective)

On 13 November 2025, the Australian Government published a [notification](#) regarding the addition of five chemicals to the Australian Industrial Chemicals Introduction Scheme (AICIS) inventory under Section 82 of the Industrial Chemicals Act 2019. This is because five years have passed since the assessment certificates for the industrial chemicals were issued. The AICIS Inventory, or the Australian Inventory of Industrial Chemicals, is an online database that lists industrial chemicals available for use in Australia. It serves as a resource for importers and manufacturers to determine if a chemical is already listed and subject to AICIS regulations.

The five chemicals are:

- » 2,1-benzisothiazole-5-sulfonamide, 3-[(1E)-2-(3-chloro-4-hydroxyphenyl)diazenyl]- (CAS No. 1166834-57-6)
- » phenol, 2-chloro-4-[(1E)-2-(1-methyl-1H-pyrazol-5-yl)diazenyl]- (CAS No. 1184721-10-5)
- » phenol, 2-chloro-4-[(1E)-2-[3-(methylthio)-1,2,4-thiadiazol-5-yl]diazenyl]- (CAS No. 1444596-49-9)
- » 1-propanaminium, 3-[(4-amino-9,10-dihydro-3-methyl-9,10-dioxo-1-anthracenyl)amino]-N,N,N-trimethyl-, methyl sulfate (1:1) (CAS No. 16517-75-2)
- » amines, polyethylenepoly-, reaction products with maleated 1-dodecene-1-octene polymer (CAS No. 3103256-18-1)

Under the conditions of the addition of these chemicals, there is an obligation for manufacturers and importers to notify the authorities within 28 days if the circumstances of said import or manufacture are different to those outlined in the assessments for a given substance. Penalties for non-compliance include fines.

# NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations,  
Policies, and Standards  
Issue 12 – 2025*



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