NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 3 – 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 in place worldwide. The complexity and variability of requirements and guidance has led to an increased burden for the industry and its supply chain.

IAEG work groups address such issues as chemical material declarations and reporting requirements, the development of alternative technologies, and greenhouse gas reporting and management. They create a forum for diverse and often competitive businesses to come together and share information on global environmental requirements. In addition, IAEG provides opportunities for wider education on environmental issues and the supply chain via its meetings agendas and bespoke seminars.

IAEG WORK GROUP 9 NEWSLETTER

The Aerospace and Defense (AD) industry is committed to developing an approach to help the AD industry evaluate emerging global chemical, environmental, social, and governance regulations and their impact on compliance and potential operational risk for companies and their supply chain. The objectives are to:

- Maintain a list of global regulations, policies and standards considered and to be considered, including executive summaries of those regulations.
- Develop a method to evaluate designated emerging regulations potential impact on compliance and/or operational risk, business continuity and/or impact on supply chain.
- Develop summaries of the associated timeline for regulations (e.g., deadlines) and highlight the specific impacts.
- Develop communication materials and conduct informational webinars, as appropriate, for member companies and/or AD supply chain companies, as appropriate.

This Newsletter summarizes chemical, environmental, social, and governance regulations relevant to the AD industry. Contact Lisa Brown at myrna.l.brown@lmco.com for any questions on this Newsletter. For general assistance on IAEG matters, contact Michele Lawrie-Munro at mlawriemunro@iaeg.com.

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GLOBAL

Public consultation on the Corporate Net-Zero Standard Version 2.0 (published)

The Science Based Targets initiative (SBTi) launched a public consultation for the initial draft of the Corporate Net-Zero Standard Version 2.0 (CNZS V2) on 18 March 2025, aiming to refine its framework for corporate climate target-setting. This update builds on the latest Intergovernmental Panel on Climate Change science and the United Nations recommendations, introducing stricter yet practical guidelines for Scope 1, 2, and 3 emissions targets, clearer progress assessment formulas, and revised rules for using Environmental Attribute Certificates to prioritize direct emission reductions. It also offers a categorization system to make the standard more inclusive for companies of varying sizes and regions. with feedback shaping a second draft, pilot testing, and a final release expected in early 2026. Companies can continue using the current standard (V1.2) for near-term targets through 2026, with a transition to CNZS V2 planned by 2030.

Key effective dates include the consultation deadline of 1 June 2025, a question & Answer session on 9 April 2025, and the anticipated final standard release in early 2026. No explicit financial incentives or penalties are outlined in the draft, as SBTi is a voluntary initiative focused on credibility and alignment with climate science. However, the standard indirectly incentivizes adoption by enhancing corporate reputation and investor appeal through rigorous, transparent climate commitments. Non-compliance with the updated standard post-2030 could risk a company's targets being deemed unaligned with SBTi criteria, potentially impacting market competitiveness, though no formal penalties are specified.

ASIA

China

Three indicative lists related to certain per- and polyfluoroalkyl substances, their salts, and related compounds (consultation)

On 25 February 2025, the Foreign Environmental Cooperation Center of the Ministry of Ecology and Environment (MEE) issued a call for public comments on three indicative lists related to substances listed or proposed for listing under the Stockholm Convention on Persistent Organic Pollutants (POPs). The Stockholm Convention is a global treaty aimed at protecting human health and the environment from the harmful effects of persistent organic pollutants by restricting or eliminating their production, use, and release.

The consultation covers the following three documents:

- a draft indicative list of long-chain perfluorocarboxylic acids (PFCAs), their salts, and related compounds
- an updated indicative list of perfluorooctanoic acid (PFOA; CAS No. 335-67-1), its salts, and related compounds
- an updated indicative list of perfluorohexane sulfonic acid (PFHxS; CAS No. 355-46-4), its salts, and related compounds

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These lists support implementation of the Stockholm Convention, which entered into force for China on 11 November 2004. The draft indicative list for long-chain PFCAs follows the recommendation made at the 20th meeting of the POPs Review Committee (POPRC-20) in September 2024 to add long-chain PFCAs to Annex A of the Convention, with specific exemptions. A working group was established to develop the indicative list and address overlap with the previously listed PFOA-related compounds.

The Stockholm Convention Secretariat prepares the indicative lists aid Parties in identifying substances falling within the scope of Annex A listings and are regularly updated in response to decisions made at Conferences of the Parties.

More information can be found here in Chinese.

India

Amendment to the Battery Waste Management Amendment Rules, 2022 (published)

The Ministry of Environment, Forest, and Climate change published an amendment to the Battery Waste Management Rules, 2022. These rules aim to create a comprehensive system for the environmentally sound management of battery waste, so that batteries are collected, recycled, and disposed of in a manner that protects public health and the environment in India.

This amendment clarifies certain points of Schedule 1 to the rules, mainly that producers can also print their Extended Producer Responsibility registration number on the batteries themselves, the equipment containing the batteries, the packaging, or the product information brochure, provided they also submit this information in writing to the Central Pollution Control Board. It also clarifies that the marking of chemical symbol “Cd” or “Pb” is not applicable where the metal concentration of cadmium in the battery is less than or equal to 0.002% (20 parts per million) or lead in the battery is less than or equal to 0.004% (40 parts per million) by weight.

This amendment came into force on 24 February 2025. No penalties are mentioned; the applicable penalties will be those included in the Battery Waste Management Rules, 2022.

Japan

Domestic Implementation Plan for the Global Framework on Chemicals (draft)

In February 2025, Japan drafted a Domestic Implementation Plan (can be found here in Japanese) for the Global Framework on Chemicals (GFC) that was adopted at the fifth International Conference on Chemicals Management in September 2023. Comments were due on 22 March 2025. The GFC replaces the Strategic Approach to International Chemicals Management and aims to prevent or minimize adverse effects from chemicals and waste across their life cycle.

Japan established an inter-ministerial coordination body to oversee the formulation of this plan, ensuring alignment with the GFC framework and integrating input from multi-stakeholder dialogues. The plan supports the principles of the GFC and defines five strategic objectives:

- establishing legal, institutional, and capacity-building frameworks for managing chemicals throughout their life cycle
- providing access to comprehensive knowledge, data, and information to support decision-making

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- addressing key concerns related to chemical management
- promoting safer alternatives and sustainable solutions within product value chains
- enhancing implementation through resource mobilization, partnerships, and integration into decision-making processes

The plan also details Japan's chemical management framework, covering national legislation on chemical safety, environmental protection, consumer product safety, and occupational health. It takes into account international agreements such as the Basel, Rotterdam, and Stockholm Conventions, the Minamata Convention, and the Montreal Protocol.

To support implementation, the plan outlines measures for risk assessment, regulatory enhancements, and increased transparency. A review mechanism will monitor progress and enable policy updates as needed.

Amendment to the notification on substances designated as carcinogenic pursuant to the provisions of Article 577-2, Paragraph 5 of the Industrial Safety and Health Ordinance" (published)

On 19 February 2025, the Japanese Ministry of Health, Labor, and Welfare (MHLW) published an amendment (can be found here in Japanese) to the notification on substances designated as carcinogenic under Article 577-2(5) of the Industrial Safety and Health Regulations (MHLW Notification No. 25 of 2025). The amendment revises the classification of carcinogenic substances subject to regulation. The scope of substances classified as carcinogenic has been updated to include those identified under Japan Industrial Standard Z7252 (GHS classification) as Category 1 carcinogens, based on government-conducted hazard assessments. The amendment also aligns with changes introduced by Cabinet Order No. 35 of 2025, which revises the criteria for risk assessment substances, now covering substances classified as hazardous or harmful by 31 March 2024.

Penalties are not mentioned in the update.

Updates to the list of substances requiring safety data sheets and Globally Harmonized System -based labels under the Industrial Safety and Health Act (amendment)

Japan's Ministry of Health, Labor, and Welfare (MHLW) has made significant updates to the list of substances (can be found here in Japanese) requiring safety data sheets (SDS) and Globally Harmonized System (GHS)-based labels under the Industrial Safety and Health Act (ISHA). These updates add 155 new substances, delete two previously included substances, and introduce revised cut-off values for others. The goal of these changes is to improve workplace safety by properly classifying and labeling hazardous substances. The enforcement of these updates began on 1 April 2027, with a transition period for substances already in stock running until 31 March 2028.

The update includes the following:

- addition of alkyl (benzyl) 2 (dimethyl) ammonium chloride (CAS No. 8001-54-5) with specific carbon chain requirements
- removal of sodium stearate (CAS No. 822-16-2) and triphenyl phosphate (CAS No. 115-86-6) after being deemed non-hazardous
- lowering cut-off values (also here in Japanese) for 1,1-dichloroethylene (CAS No. CAS No. 75-35-4) and 4-nitrotoluene (CAS No. 99-99-0) from 1% to 0.1%, requiring updated SDSs and labels at lower concentrations.

- introducing new cut-off values for several substances, such as meptyldinocap (CAS No. 131-72-6) and trisodium nitrilotriacetate (CAS No. 5064-31-3), clarifying regulatory requirements
- removal of four substances, including paraquat and dioxins, from SDS and labeling obligations

MHLW has also proposed amendments to the ISHA aimed at strengthening the enforcement of SDS transfer requirements for hazardous substances. The proposed amendments introduce stricter enforcement mechanisms for SDS requirements under ISHA. If adopted, companies handling hazardous substances will face penalties for failing to comply with SDS obligations, particularly for substances that pose risks to worker health and safety. In addition, the proposal mandates that companies regularly update SDSs to ensure the most up-to-date hazard information is available to workers and downstream users.

For substances with relatively low toxicity that are considered confidential, companies will be permitted to use alternative names. This means part of the ingredient name may be omitted or replaced. However, companies must maintain records of the full ingredient list alongside the alternative name and be able to provide this information upon request, ensuring transparency while protecting proprietary formulations.

These changes will impact manufacturers, importers, and downstream users handling hazardous substances, requiring them to review SDS procedures, ensure timely updates, and prepare for stricter enforcement of compliance. Companies are advised to prepare for these changes by reviewing their inventory and updating SDSs and labels as needed to comply with the new cut-off values and substances.

More information can be found in Japanese in this announcement from the MHLW.

Philippines

Addition of new chemicals to the Inventory of Chemicals and Chemical Substances (effective)

On 22 January 2025, the Department of Environment and Natural Resources (DENR) issued an update to the Philippine Inventory of Chemicals and Chemical Substances (PICCS), reflecting the addition of 96 new chemicals in 2022 and 65 new chemicals in 2023, as submitted through the Pre-Manufacture Pre-Importation Notification (PMPIN) process. The update became effective on 6 February 2025. The DENR issued this update pursuant to the Toxic Substances and Hazardous and Nuclear Waste Control Act of 1990 (Republic Act No. 6969) and its Implementing Rules and Regulations (IRR).

PICCS is a national inventory that lists chemical substances stored, imported, exported, used, processed, manufactured, or transported in the Philippines. It includes the chemical name, the CAS number, and IUPAC[1] nomenclature. The inventory is updated annually based on compliance with the PMPIN process, ensuring that newly introduced chemicals meet regulatory requirements before being listed.

The total number of chemicals listed in PICCS is now 22,438, reflecting the addition of the 96 new chemicals in 2022 and the 65 new chemicals in 2023. This update applies to existing chemicals already listed in PICCS, as well as new chemicals that have undergone the PMPIN Compliance Certification and submitted a Notice of Commencement.

Importers and manufacturers must submit a notice of commencement before 31 December for chemicals to be included in the subsequent PICCS update. The updated PICCS list is published annually and is available through the Environmental Management Bureau website and the Online Permitting and Monitoring System.

[1] i.e., International Union of Pure and Applied Chemistry.

Singapore

Workplace Fairness Act, 2024 (published)

On 12 November 2024, Singapore's Attorney-General's Chambers published Workplace Fairness Act, 2024 (Bill No. 50/2024), a proposed legislation aimed at enhancing workplace anti-discrimination protections. The bill would take effect upon parliamentary approval and publishing following standard legislative timelines.

The Workplace Fairness Act introduces specific measures – such as i) prohibiting discrimination based on age, nationality, race, religion, sex, marital status, disability, and other characteristics; ii) mandating fair hiring and grievance processes; and iii) protecting against retaliation for reporting discrimination – that could reshape the operational and ESG landscape for companies in Singapore. Socially, the bill's focus on fair treatment aligns with ESG's social pillar, enhancing employee welfare and inclusion, while governance requirements for transparent grievance handling could elevate accountability standards, appealing to ESG-conscious investors and government clients like the Singapore Ministry of Defense.

These measures position workplace fairness as an ESG priority, potentially benefiting companies that proactively adopt robust anti-discrimination frameworks with improved reputations and talent retention, while those lagging risk losing competitive edge in a global market valuing social responsibility. Although the bill itself specifies no direct financial penalties, non-compliance with its provisions, once enacted, could lead to enforcement actions under Singapore's employment laws – such as fines up to SGD 10,000 per offense under related statutes like the Employment Act – or reputational damage affecting contracts, particularly with ESG-sensitive public sector clients, by the mid-2020s.

Amendments to the Environmental Protection and Management Act 1999 (published)

On 31 January 2025, the Minister for Sustainability and the Environment published the Environmental Protection and Management Act 1999 (EPMA) (Amendment of Second Schedule) Order 2025, which will enter into force on 1 August 2025. The amendment updates the Second Schedule of EPMA by adding two chemical groups and modifying restrictions on mercury-containing products.

The amendments include:

- addition of long-chain perfluorocarboxylic acids and their salts and related compounds (C9–C21) to Part I of the Second Schedule
- addition of medium-chain chlorinated paraffins (C14–C17) to Part I of the Second Schedule
- revisions to existing mercury-related entries, including restrictions on:
  - controlled electrical and electronic equipment containing mercury
  - batteries containing mercury, with a maximum limit of 0.0005% by weight per cell
  - cold cathode fluorescent lamps and external electrode fluorescent lamps used in electronic displays
  - fluorescent lamps, high-pressure mercury vapor lamps, and measuring devices that contain mercury
  - mercury in switches, relays, non-electronic measuring devices, vacuum pumps, photographic film, propellants for satellites and spacecraft, and tire balancers
- revisions to Part II of the Second Schedule, including updated conditions for photographic paper and propellants that contain mercury

The updated schedule sets concentration limits for mercury in specific products rather than imposing outright prohibitions.

Penalties are not mentioned in the update.

Proposed control of chlorpyrifos, paraquat, and paraquat salts (consultation)

On 27 February 2025, Singapore's National Environment Agency (NEA) launched a public consultation on the proposed control of chlorpyrifos, paraquat and paraquat salts at all concentration levels and in all preparation forms as hazardous substances (HS) under the Second Schedule of the Environmental Protection and Management Act and its Hazardous Substances Regulations. The proposed amendments would remove existing exclusions and separately list chlorpyrifos as a specific HS, rather than under the general phosphorus compound group. Once regulated, the manufacture, import, export, purchase, sale, use, transport, and storage of these substances would require a HS license or permit issued by NEA.

The NEA also seeks feedback on two international developments:

- the potential listing of chlorpyrifos, paraquat and paraquat salts under Annex III of the Rotterdam Convention, which would subject their transboundary movement to the Prior Informed Consent procedure as early as October 2025
- the proposal under the Stockholm Convention to list chlorpyrifos in Annex A for elimination

NEA intends to finalize the regulatory changes by May 2025, followed by a six-month transitional period before entry into force in October 2025.

South Korea

Amendments to the Enforcement Rule and Enforcement Decree and Enforcement Rule of the Act on Registration and Evaluation of Chemical Substances (consultation)

The Ministry of Environment has proposed amendments to the Enforcement Rule and Enforcement Decree of the Act on Registration and Evaluation of Chemical Substances to align secondary legislation with recent changes to the act. These updates introduce a new classification, "substances of unidentified hazard," along with changes to chemical reporting requirements and regulatory responsibilities.

The amendments to the Enforcement Rule establish clearer classification criteria for hazardous substances and update chemical reporting requirements. The Korea Environment Corporation (KECO) will now handle new chemical substance reporting and conduct facility inspections. Additionally, terminology used in chemical classification has been revised, replacing "toxic substances" with new categories such as "human acute hazardous substances" and "ecologically hazardous substances." The amendments also expand chemical information disclosure requirements, allowing the release of hazard classifications and chemical uses even if a data protection request is in place.

The Enforcement Decree amendments further refine the criteria for designating hazardous substances and formalize the establishment of a Hazards Evaluation Committee. Companies must comply with the updated requirements to meet regulatory expectations.

More information can be found here in Korean.

EUROPE

European Union

Work program for 2025 (published)

On 11 February 2025, the European Commission (EC) published its work Program for 2025, setting out key strategies, action plans, and legislative initiatives that will guide the European Union's (EU's) policy direction for the year. The program builds on EC's overarching objectives, focusing on competitiveness, security, simplification, and digital transformation.

A core focus of the program is simplification, with measures aimed at reducing administrative burdens by at least 25% across various processes, with a specific target of 35% for small and medium enterprises. This includes the digitalization of reporting and permit-granting processes to facilitate compliance. The EC also emphasizes the importance of effective implementation of EU laws and policies to ensure that regulations achieve their intended impact.

Economic competitiveness remains a priority, with efforts to modernize the single market and implement the Competitiveness Compass, an initiative aimed at strengthening European industry.[2] The program also includes proposals to reinforce defense and security, address geopolitical instability, and enhance the EU's crisis preparedness. Other major themes include safeguarding the EU's resources, particularly in farming, water management, and energy security, while ensuring a socially fair transition in the green and digital economy.

Additionally, the program outlines legislative streamlining efforts, including plans to withdraw thirty-seven pending proposals (Annex IV) and repeal four regulations (Annex V). The full list of pending proposals is provided in Annex III. These measures aim to simplify the regulatory framework and remove outdated or unworkable proposals.

The Clean Industrial Deal (published)

On 26 February 2025, the European Commission (EC) published the Clean Industrial Deal (CID) that aims to enhance industrial competitiveness while advancing decarbonization. The initiative emphasizes affordable energy access, financing mechanisms, and streamlined regulations to support industries in reducing carbon emissions. While the CID primarily targets energy-intensive sectors, its broader industrial policies, such as facilitating clean energy procurement and advancing circular economy practices, encourages sustainable production and material efficiency.

Key measures relevant to the industry include the Industrial Decarbonization Accelerator Act, set for late 2025, which aims to simplify permitting for clean energy projects. Additionally, the EC proposes mobilizing €100 billion to support clean manufacturing, with funding opportunities for companies investing in low-carbon technologies. In terms of compliance, the CID removes fixed minimum penalties for sustainability violations, opting instead for a case-by-case approach to

[2] While the Competitiveness Compass is referenced in the program and aligns with it, it is a separate initiative published by the EC to assess and strengthen Europe's economic performance.

enforcement. Firms operating in the European Union should prepare for increased regulatory scrutiny and align with sustainability targets to remain competitive.

Legislative proposals to streamline sustainability rules and investment programs (adopted)

The European Commission's (EC's) simplification package, announced on 25 February 2025, and published on its finance portal, introduces legislative proposals to streamline sustainability rules and European Union investment programs. While adopted by the EC, these measures – spanning sustainable finance reporting, due diligence, EU taxonomy, and investment frameworks like InvestEU – require approval from the European Parliament and Council, with implementation expected post-2025 agreement and publication in the EU Official Journal, likely taking effect in 2026 or later.

The package introduces specific measures:

- reducing sustainability reporting templates by 70%
- easing "Do No Significant Harm" (DNSH) criteria for pollution control
- postponing Corporate Sustainability Reporting Directive (CSRD) deadlines to 2028 for large firms
- optimizing InvestEU to mobilize €50 billion in investments

These measures could significantly influence companies under ESG frameworks. Firms that are heavily engaged in sustainable aviation may benefit from simplified EU taxonomy reporting and transition finance options, facilitating investments in green technologies like hydrogen propulsion. Defense contractors supplying military equipment, could leverage enhanced InvestEU funding for research and development in decarbonized systems (e.g., hybrid-electric vehicles), aligning with ESG's environmental goals. Socially, reduced administrative burdens (saving €6.3 billion annually) ease compliance for small and medium enterprises in supply chains, while governance improves via clearer ESG reporting, appealing to sustainability-focused investors.

These measures position ESG as a catalyst for competitiveness, rewarding proactive firms with access to €50 billion in public-private funds and reduced costs, potentially strengthening market positions for leaders in sustainable innovation. However, non-compliance with future CSRD or Corporate Sustainability Due Diligence Directive (CSDDD) requirements, once enforced, could trigger penalties under existing EU frameworks—such as fines up to 5% of net turnover under CSDDD for large firms—or loss of investment eligibility.

New classification, labeling, and packaging intentions and consultations for ten substances (consultation)

The European Chemicals Agency (ECHA) has published notifications on the submission of new classification, labeling, and packaging (CLP) intentions and consultations for four substances with updated deadlines for comment. In addition, ECHA has provided notice of three harmonized classification and labeling (CLH) intentions registered and three CLH consultations.

CLP intentions and consultations

N,N-dicyclohexylbenzothiazole-2-sulphenamide (EC No. 225-625-8; CAS No. 4979-32-2) – comments due on 22 April 2025. This substance is primarily used as a delayed-action vulcanization accelerator for both natural and synthetic rubbers, enhancing their strength and elasticity.

- proposed classification: very persistent, very bio-accumulative (vPvB), EUH441
- the hazard classes open for commenting: persistent, bio-accumulative, toxic (PBT)/vPvB

2,3-epoxypropyl neodecanoate (EC No. 247-979-2; CAS No. 26761-45-5) – comments due on 18 April 2025. This substance is mostly used as curing agent and binder in epoxy paint systems, varnishes, adhesives, and construction materials.

- proposed classification:
  - skin sens. 1A; H317: C ≥ 0,001%
  - muta. 2, H341
  - carc. 1B, H350
- hazard classes open for commenting: Carcinogenicity

Napropamide (ISO); (2RS)-N,N-diethyl-2-(1-naphthyloxy)propanamide (EC No. 239-333-3; CAS No. 15299-99-7) – comments due on 11 April 2025. This substance is used against a number of annual grasses and broad-leaved weeds.

- proposed classification:
  - aquatic acute 1, H400
  - aquatic acute 1, M-factor=1
  - M-factor=10
  - aquatic chronic 1, H410
  - aquatic chronic 1,
- hazard classes open for commenting:
  - physical hazards
  - carcinogenicity
  - germ cell mutagenicity
  - reproductive toxicity
  - acute toxicity – inhalation
  - acute toxicity – dermal
  - acute toxicity – oral
  - aspiration hazard
  - specific target organ toxicity – single exposure
  - specific target organ toxicity – repeated exposure
  - skin corrosion/irritation
  - serious eye damage/eye irritation
  - respiratory sensitization
  - skin sensitization
  - hazardous to the aquatic environment
  - hazardous to the ozone layer

Dibenzylbenzene, ar-methyl derivative (EC No. 258-649-2; CAS No. 53585-53-8) – comments due on 31 December 2025. This substance is used in heat transfer fluids and in the manufacture of electrical, electronic, and optical equipment.

- proposed classification:
  - reproductive toxicity
  - hazardous to the aquatic environment
  - PBT/vPvB

1,3,4,6,7,8-hexahydro-4,6,6,7,8,8-hexamethylindeno[5,6-c]pyran (galaxolide; EC No. 214-946-9; CAS No. 1222-05-5) – comments due on 28 March 2025. Galaxolide is a synthetic polycyclic musk used as a fragrance ingredient in household cleaning products, air fresheners, and scented plastics, valued for its long-lasting musky aroma and stability.

- proposed classification: reproductive toxicity

CLH Intentions

France has submitted a CLH intention regarding 2-tert-butyl-4-methoxyphenol; tert-butyl-4-methoxyphenol (EC and CAS Nos. not available) with the dossier expected to be submitted by 31 December 2025. There is no proposed classification provided.

Austria has submitted a CLH intention regarding dibenzylbenzene, ar-methyl derivative; dibenzyltoluene (EC and CAS Nos. not available) proposing a harmonized classification including reproductive toxicity, hazardous to the aquatic environment, and PBT/vPvB. The dossier is expected to be published by 31 December 2025.

Austria has submitted a CLH intention regarding maleic acid (EC No. 203-742-5; CAS No. 110-16-7) proposing a harmonized classification including acute toxicity (Acute Tox. 4), skin corrosion (skin Corr. 1) and eye damage (eye dam. 1). Maleic acid is already classified as acute tox. 4, skin irrit. 2, eye irrit. 2, skin sens. 1, and STOT SE 3. The dossier is expected to be published by 31 December 2025.

CLH consultations

Sodium bromate (EC No. 232-160-4; CAS No. 232-160-4) – comments on CLH report due on 9 May 2025. The proposed future entry in Annex VI of the CLP regulation is as follows:

- caute tox. 3, H301,
- muta. 2, H341,
- carc. 1B, H350,
- STOT SE 1, H370 (hearing organs)
- ATE (oral): 157 milligram per kilogram by weight (mg/kg bw)

The hazard classes open for commenting are:

- carcinogenicity
- germ cell mutagenicity
- acute toxicity - oral
- specific target organ toxicity – single exposure

Reaction products of ammonium bromide and sodium hypochlorite, generated in-situ (EC and CAS Nos. not available) – comments on CLH report due 9 May 2025. The proposed future entry in Annex VI of CLP regulation is as follows:

- repr. 1B, H360FD,
- lact., H362,
- aquatic chronic 2, H411

Potassium bromate (EC No. 231-829-8; CAS RN 7758-01-2) – comment on CLH report due on 9 May 2025. The proposed future entry in Annex VI of CLP regulation is as follows:

- ox. Sol. 1, H271,
- acute Tox. 3, H301,
- muta. 2, H341,
- carc. 1B, H350,
- STOT SE 1, H370 (hearing organs)
- ATE (oral): 157 mg/kg bw

The hazard classes open for commenting are:

- germ cell mutagenicity
- acute toxicity - oral
- specific target organ toxicity – single exposure

New unintentional trace contaminants limits for polybrominated diphenyl ethers and polychlorinated biphenyls (draft amendment)

On 18 February 2025, the European Commission opened public consultations on two draft delegated regulations amending Regulation (EU) 2019/1021 on persistent organic pollutants (POPs). The amendments propose new unintentional trace contaminant (UTC) limits for polybrominated diphenyl ethers (PBDEs) in mixtures and articles and polychlorinated biphenyls (PCBs) in substances, mixtures, and articles. These changes aim to strengthen regulatory controls, align with the Stockholm Convention, and facilitate enforcement. Comments were due on 18 March 2025.

The Stockholm Convention on POPs is a global treaty that aims to eliminate or restrict the production, use, and release of POPs due to their toxic, bio-accumulative, and long-lasting nature. POPs, including PBDEs and PCBs, can persist in the environment for decades, travel long distances, and pose risks to human health and ecosystems.

For PBDEs, the amendment revises the existing UTC limits in Annex I for the following five PBDE substances (EC and CAS No. not available):

- tetrabromodiphenyl ether
- pentabromodiphenyl ether
- hexabromodiphenyl ether
- heptabromodiphenyl ether
- decabromodiphenyl ether

The revised thresholds include:

- a general limit of ten milligrams/kilogram (mg/kg) for PBDEs in mixtures and articles, excluding food contact materials regulated under Regulation (EC) No 1935/2004
- a phased reduction for recovered materials, with limits set at 500 mg/kg upon entry into force, decreasing to 350 mg/kg by 30 December 2025, and further to 200 mg/kg by 30 December 2027
- stricter limits for toys and childcare products, reducing to 10 mg/kg within eighteen months of entry into force, excluding food contact materials regulated under Regulation (EC) No 1935/2004

For PCBs, which were banned in the European Union in 1985, but may still be present in old equipment and unintentionally generated during certain chemical processes, the amendment introduces:

- a general UTC limit of 0.2 mg/kg for PCBs in substances, mixtures, and articles
- a higher limit of 25 mg/kg for organic pigments and dyes, reducing to 10 mg/kg three years after entry into force, allowing time for industry to adapt and limit unintentional PCB contamination

Proposals to list four chemicals as substances of very high concern (consultation)

Member States or the European Chemicals Agency, on request of the European Commission, may propose a substance to be identified as an SVHC by preparing a dossier in accordance with the requirements set out in Annex XV to REACH. Interested parties are invited to submit comments on such reports during the consultation. Recently, four chemicals have been proposed as substances of very high concern:

- n-hexane (EC No. 203-777-6; CAS No. 110-54-3) proposed under Article 57f
- 1,1,1,3,5,5,5-heptamethyl-3-[(trimethylsilyl)oxy]trisiloxane (EC No. 241-867-7; CAS No. 17928-28-8), proposed under Article 57e
- decamethyltetrasiloxane (EC No. 205-491-7; CAS No. 141-62-8), proposed under Article 57e
- tetra(sodium/potassium) 7-[(E)-{2-acetamido-4-[(E)-(4-{[4-chloro-6-({2-[(4-fluoro-6-{[4-(vinylsulfonyl)phenyl]amino}-1,3,5-triazine-2-yl)amino]propyl}amino)-1,3,5-triazine-2-yl]amino}-5-sulfonato-1-naphthyl)diazenyl]-5-methoxyphenyl}diazenyl]-1,3,6-naphthalenetrisulfonate; Reactive Brown 51 (EC No. 466-490-7; CAS No. not available), proposed under Article 57c

More information can be found here for n-hexane and in this announcement for the other three substances.

France

Prohibitions, monitoring requirements, financial measures, and industrial decontamination efforts related to per- and polyfluoroalkyl substances (published)

On 28 February 2025, the French government published Law No. 2025-188 in the Official Journal of the French Republic (JORF), introducing prohibitions, monitoring requirements, financial measures, and industrial decontamination efforts

related to perfluoroalkyl and polyfluoroalkyl substances (PFAS) in consumer products, drinking water, and industrial emissions.

Article 1
Under Article 1, the law prohibits the manufacture, import, export, and sale- including free distribution of specific PFAS-containing products. From 1 January 2026, wax products, and consumer textiles, including footwear and waterproofing agents, will be banned, except for protective gear used in national defense and civil security. From 1 January 2030, the restriction will be extended to all textiles containing PFAS, with exemptions for essential-use textiles, sovereignty-related products that have no alternatives, and industrial technical textiles. The prohibitions will not apply to products where PFAS concentrations remain below residual limits, which will be defined by decree.

The law also mandates comprehensive monitoring of PFAS in drinking water. Amendments to the Public Health Code require that PFAS substances, both those listed by decree and others detected at quantifiable levels in locally relevant conditions, be included in routine sanitary controls. The Minister for Risk Prevention, jointly with the Minister of Health, must create and maintain a publicly available map identifying PFAS-emitting sites, which will be updated annually to include emission levels and decontamination measures. Pollution thresholds and remediation actions will be set by ministerial decree, and the government must submit a report within one year proposing updated PFAS drinking water standards.

Article 2
Under Article 2, the law establishes a national trajectory aimed at phasing out industrial PFAS discharges within five years. The specifics of this phase-out, including the substances covered and implementation details, will be outlined in a decree. Additionally, a regulatory fee will apply to industrial facilities subject to authorization under Article L. 512-1 of the Environmental Code if they emit at least 100 grams of PFAS annually into water, whether directly or via a collection system. These facilities will be required to pay €100 per 100 grams emitted, with the list of affected substances and implementation guidelines set by decree.

Article 3:
Under Article 3, the government is tasked with financing PFAS decontamination efforts. Within one year, it must develop an interministerial action plan to support local authorities managing drinking water and wastewater treatment, outlining available resources, the role of water agencies, and state support measures.

Article 5:
Under Article 5, regional health agencies must publish annual reports on PFAS levels in drinking water, including bottled water. The Minister of Health will consolidate these data into a national annual report on tap water quality related to PFAS contamination.

Investigations and enforcement actions will be carried out under Articles L. 521-12 to L. 521-20 of the Environmental Code. Officials are granted investigative powers and may conduct on-site inspections in accordance with Article L. 521-11-1. In addition to enforcement measures, industrial operators emitting PFAS above the threshold of 100 grams per year will be required to pay a regulatory fee of €100 per 100 grams, as specified under Article 4.

More information can be found here in French.

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United Kingdom

Amendment to Regulation (EU) 2019/1021 regarding dechlorane plus and UV-328 (published)

The Department for Environment, Food, and Rural Affairs published an amendment to Regulation (EU) 2019/1021 on persistent organic pollutants. This amendment concerns the list of substances in Annex I of the regulation, specifically modifying the entries for dechlorane plus (EC No. 236-948-9; CAS No. 13560-89-9) and UV-328 (EC No. 247-384-8; CAS No. 25973-55-1) by updating the allowed purposes and their respective timeframes. The regulation modifies the fourth column (concerning restrictions) in Part A of Annex 1 for the two substances. The placing on the market and use are now allowed until 26 February 2030 for aerospace, space, and defense applications as well as for medical imaging and radiotherapy devices and installations.

Furthermore, replacement parts for and repair of articles originally manufactured with dechlorane plus in various sectors, including aerospace, space, defense, land-based motor vehicles, stationary industrial machines, marine and outdoor equipment, and certain instruments, are allowed until the earlier of the end of the article's service life or 31 December 2044.

For UV-328, the manufacturing, placing on the market, and use are permitted until 26 February 2030 for land-based motor vehicles, industrial coatings for engineering machines and rail transportation, heavy-duty coatings for large steel structures, mechanical separators in blood collection tubes, triacetyl cellulose film in polarizers, photographic paper, and aerospace and defense applications. Replacement parts for and repair of articles originally manufactured with UV-328 in land-based motor vehicles, stationary industrial machines, and liquid crystal displays in certain instruments are allowed until the earlier of the end of the service life or 31 December 2044. For aerospace and defense applications using UV-328 originally, replacement parts and repairs are allowed until the earlier of the end of the service life or 31 December 2044. Additionally, the placing on the market and use of UV-328 are allowed for replacement parts for liquid crystal displays in medical and in-vitro diagnostic devices and in certain instruments for medical purposes until the end of the service life of the article.

These amendments affect manufacturers and users of dechlorane plus and UV-328 by setting specific deadlines for their use in different applications and allowing for the continued use of replacement parts in certain circumstances. Importers and retailers of these substances and articles containing them need to be aware of these revised restrictions and allowed uses. The key dates specified in these amendments are 26 February 2030 and 31 December 2044, marking deadlines for certain uses and the use of replacement parts containing dechlorane plus and UV-328. The amendment entered into force on 1 April 2025.

The regulations do not explicitly detail fines or implications for non-compliance within this specific amending instrument.

Updates to the classification and labeling list (published)

On 26 February 2025, Ministers acting on behalf of the Secretary of State, with the consent of Scottish and Welsh Ministers, announced a decision regarding the Great Brittain mandatory classification and labeling (GB MCL) of 46 chemical substances. This decision updates the GB MCL list, incorporating new and revised classifications. The GB MCL list is the equivalent of the European Union classification, labeling, and packaging list.

Summaries of these classifications are available in the GB CLP publication table, alongside the entry into force date, 15 February 2025, and the compliance deadline, 15 August 2026. The decision was based on an assessment of the intrinsic hazards of these substances, as detailed in the Agency Technical Reports, with no significant impacts identified in the impact and policy assessments outlined in the Agency Opinions.

The Seventh Carbon Budget establishes emission targets for 2028-2042 (published)

On 4 December 2024, the United Kingdom (UK) Climate Change Committee published the Seventh Carbon Budget, establishing emissions targets for 2038–2042 and capping emissions at 1,085 metric ton CO_2 equivalent, an 81% reduction from 1990 levels. It recommends immediate action in the 2020s to meet these goals, with policy implementation likely formalized in 2025 following consultation, as part of the UK's net-zero commitment under the Climate Change Act 2008.

The Seventh Carbon Budget introduces specific measure such as mandating sustainable aviation fuels (SAF), promoting demand management (e.g., fewer flights), and requiring carbon capture and storage and hydrogen use in industry. For example, firms must adapt to aviation-specific measures, accelerating research and development into SAF-compatible engines and low-carbon propulsion systems (e.g., hydrogen or electric). Others may face pressure to decarbonize supply chains and align with ESG-linked procurement standards from the Ministry of Defense. Socially, the budget's push for green tech jobs (e.g., via low-carbon electricity expansion) offers opportunities but demands workforce retraining, and governance requires transparent emissions reporting to meet stakeholder and investor scrutiny.

These measures position ESG as a strategic driver, rewarding companies that innovate (e.g., hybrid military vehicles or energy-efficient aircraft) with competitive edges in contracts and ratings, while laggards risk losing market share. Although the budget itself lacks direct penalties, failure to comply with future regulations stemming from these targets could incur fines under the Climate Change Act 2008 – potentially reaching millions of pounds for high-emission sectors – or exclusion from government tenders, heightening financial and operational risks by the late 2030s.

NORTH AMERICA

Canada

Amendments to the Domestic Substances List (in force)

On 12 March 2025, the Minister of the Environment published Order 2024-87-20-01 amending the Domestic Substances List (DSL) under Subsection 87(4.1) of the Canadian Environmental Protection Act, 1999 (CEPA). The Order modifies the significant new activity (SNAc) requirements for the substance oxirane, (chloromethyl)- (CAS No. 106-89-8). Specifically, the SNAc provisions now apply to its use or import in any consumer product subject to the Canada Consumer Product Safety Act when the substance is present at a concentration equal to or greater than 0.1% by weight. The threshold for importation triggers a SNAc notification if the total quantity imported in such products exceeds ten kilograms per calendar year.

Order 2024-87-20-01 also outlines exemptions for research and development or site-limited intermediate substances and for products intended solely for export. It prescribes detailed notification requirements for any proposed significant new activity, including data on substance use, consumer product information, environmental and health risk data, and contact details of the notifier. The information must be submitted at least 180 days before commencing the activity and will be assessed within 180 days of receipt. The Order entered into force on 28 February 2025.

Also on 12 March 2025, the Minister of the Environment published two other orders, entering into force on 28 February 2025, amending the DSL:

- Order 25-66-03-01 (SOR/2025-56), made under subsection 66(1) of CEPA, adds twelve substances to Part 1 of the DSL, deletes twelve substances from Part 3, and updates the names or classifications of twenty-three entries in Part 3
- Order 2025-87-03-01 (SOR/2025-57), made under subsection 87(5) of CEPA, adds five substances to Part 1 of the DSL (including a reclassified version of one previously listed substance) and adds thirteen new substances to Part 3

On 5 February 2025, the Minister of the Environment registered Order 2024-87-21-01, amending the DSL under subsection 87(3) of CEPA. The amendment moves ethanol, 2-[(2-aminoethyl)amino]- (CAS No. 111-41-1) from Part 1 to Part 2, making it subject to SNAc provisions under Subsection 81(3). This order takes effect upon registration. Under these provisions, a person must notify the Minister at least 90 days before conducting a SNAc involving the substance, including:

- manufacturing a consumer product subject to the Canada Consumer Product Safety Act in a container larger than 250 milliliters, where the substance is present at a concentration of 0.1% or more by weight
- importing such products containing the substance at a concentration of 0.1% or more by weight, if the total imported amount exceeds 10 kilograms per year

Exemptions for Order 2024-87-21-01 apply for research and development substances, site-limited intermediates, and products intended exclusively for export. The notification must include details on the activity, anticipated quantities, toxicity/exposure data, regulatory assessments from other jurisdictions, and the notifier's contact details. The government will assess the notification within 90 days.

There are no penalties associated with these updates, but companies must stay informed about the current status of substances to ensure compliance with Canadian environmental regulations.

The State of Per- and Polyfluoroalkyl Substances (PFAS) Report and risk management approach for PFAS (consultation)

On 8 March 2025, the Department of the Environment and the Department of Health published the final State of Per- and Polyfluoroalkyl Substances (PFAS) Report under section 77 of the Canadian Environmental Protection Act, 1999 (CEPA), based on an assessment conducted pursuant to paragraphs 68(b) and 68(c). The report concludes that the class of PFAS, excluding fluoropolymers, meets the criteria under paragraphs 64(a) and 64(c) of CEPA, as these substances may have immediate or long-term harmful effects on the environment and may pose a danger in Canada to human life or health. However, the class does not meet the criteria under paragraph 64(b) relating to a danger to the environment on which life depends.

The report further determines that the class of PFAS meets the persistence criteria under the Persistence and Bioaccumulation Regulations of CEPA, while the bioaccumulation potential could not be determined using the regulatory criteria. Fluoropolymers, which differ in exposure and hazard profiles, are excluded from the scope of the assessment and are planned for consideration in a separate evaluation.

Based on the conclusions of the report, the Ministers propose to add the class of PFAS, excluding fluoropolymers, to Part 2 of Schedule 1 to CEPA under subsection 90(1) of the Act. In addition, the government released a Risk Management Approach Document, outlining plans to develop risk management instruments for this class of substances. This includes a phased approach to prohibiting PFAS not currently regulated in firefighting foams and other uses and sectors.

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The proposed regulatory action follows a phased approach to risk management:

- Phase 1 (2025): Address PFAS in firefighting foams, which are currently unregulated due to their high potential for environmental and human exposure
- Phase 2: Address the use of PFAS in consumer products where alternatives exist, such as certain textiles, ski waxes, building materials, and food packaging materials
- Phase 3: Evaluate sectors requiring further consideration through stakeholder engagement and additional assessments

Additionally, starting in 2025, Canada will require facilities using PFAS to report their usage to the National Pollutant Release Inventory to improve the understanding of PFAS use and potential industrial contamination.

A 60-day public consultation is open until 7 May 2025, allowing stakeholders to provide feedback on the risk management approach document and the proposed regulatory measures.

Final decisions on assessments of benzotriazoles and benzothiazoles group and of boric acid, its salts, and its precursors (proposed)

On 8 March 2025, the Department of the Environment and the Department of Health published two notices under the Canadian Environmental Protection Act, 1999 (CEPA), initiating 60-day public consultations.

In the first notice, the ministers released the final decision following the assessment of the benzotriazoles and benzothiazoles group. It is concluded that 2-mercaptobenzothiazole (CAS No. 149-30-4), its salts, and certain precursors meet one or more of the criteria in section 64 of CEPA. The ministers propose to recommend their addition to Part 2 of Schedule 1 to the Act and have published a risk management approach document to support stakeholder engagement. The nine substances in the benzotriazoles subgroup do not meet the criteria under section 64, and no further action is proposed for these substances.

In the second notice, the ministers published an updated draft assessment of boric acid (CAS N. 10043-35-3), its salts and its precursors. It is proposed that these substances meet the criteria in section 64 of CEPA and should be added to Part 2 of Schedule 1. A revised risk management scope document has been issued to facilitate further discussions with stakeholders.

The public comment period for both updates is open from 8 March 2025 to 7 May 2025.

Notice of intent to remove the significant new activity requirements for 1,2-oxathiolane, 2,2-dioxide (proposed)

On 22 February 2025, the Department of the Environment published a notice of intent to remove the significant new activity (SNAc) requirements for 1,2-oxathiolane, 2,2-dioxide (CAS No. 1120-71-4) under subsection 87(4.1) of the Canada Environmental Protection Act (CEPA) with comments due on 23 April 2025. This decision follows an assessment by Environment and Climate Change Canada and Health Canada, which determined that the notified and potential uses of the substance do not meet the criteria for being toxic under section 64 of CEPA. As a result, the ministers no longer suspect that a significant new activity may contribute to making the substance harmful to human health or the environment.

The proposed amendment would move the substance from Part 2 to Part 1 of the Domestic Substances List (DSL), eliminating the requirement to submit a SNAc notification before engaging in new activities involving the substance. This

change will only take effect once the final order is published in the Canada Gazette, Part II, following consideration of public comments.

List of planned chemical management activities for the years 2024 to 2026 and a proposal prohibiting the manufacture, sale, and use of chlorinated alkanes (published)

The Canadian Government has released two updates concerning a proposal prohibiting the manufacture, sale, and use of chlorinated alkanes and an update to the list of planned chemical management activities for the years 2024 to 2026.

The first update seeks comments on regulatory measures for chlorinated alkanes after a screening assessment of short-chain (SCCAs), medium-chain (MCCAs), and long-chain chlorinated alkanes (LCCAs) up to 20 carbon atoms determined that these substances meet toxicity criteria under the Canadian Environmental Protection Act, 1999 (CEPA). As a result, SCCAs have already been prohibited under the Prohibition of Certain Toxic Substances Regulations, 2012. A consultation document (with comments due on 14 April 2025) was released to:

- inform and gather feedback on the proposed prohibition of the manufacture, import, use, and sale of MCCAs and LCCAs up to twenty carbon atoms, including products containing them, by adding them to the Prohibition of Certain Toxic Substances Regulations, 2012
- solicit information on concentration thresholds for SCCAs and MCCAs
- outline and gather comments on the proposed regulatory approach to control exports of SCCAs, MCCAs, and LCCAs up to twenty carbon atoms by adding them to the Export Control List in Schedule 3 of CEPA

Comments on these will be considered in developing the proposed regulatory measures.

The second update outlines regulatory initiatives that Environment and Climate Change Canada intends to propose or finalize over the next two years through pre-publication in the Canada Gazette, Part I and final publication in the Canada Gazette, Part II. Additionally, the plan may include regulatory initiatives scheduled for a longer-term timeframe.

United States

Reconsideration of the Greenhouse Gas Reporting Program (published)

On 12 March 2025, the U.S. Environmental Protection Agency (EPA) announced it is reconsidering the Mandatory Greenhouse Gas Reporting Program (GHGRP). The GHGRP currently requires more than 8,000 facilities and suppliers across the United States to calculate and submit annual emissions reports. EPA Administrator Lee Zeldin criticized the program as not being tied to any specific regulatory proposal under the Clean Air Act and stated it imposes significant financial burdens on businesses, particularly small enterprises. EPA indicated that this action aligns with goals to reduce regulatory costs, strengthen state-level decision-making, and revitalize industries such as energy and automotive manufacturing, while maintaining its core mission to protect the environment.

Reconsideration of the 2024 Risk Evaluation Framework Rule (published)

On 10 March 2025, the U.S. Environmental Protection Agency (EPA) announced its intent to initiate a rulemaking to reconsider the Procedures for Chemical Risk Evaluation (2024 Risk Evaluation Framework Rule) under the Toxic Substances Control Act (TSCA). The upcoming rulemaking will re-examine several key elements of the current framework:

- whether making a single risk determination for a chemical aligns with TSCA's statutory requirements
- whether all conditions of use must be evaluated simultaneously within the three-year timeframe prescribed by Congress
- how personal protective equipment (PPE) and industrial controls should be considered in occupational risk evaluations
- whether the expanded definitions in introduced by the Biden Administration exceed statutory definitions in TSCA

The upcoming rule is not yet final and therefore not subject to the Congressional Review Act at this stage.

Final rule requiring health and safety data reporting for sixteen substances (published)

The Environmental Protection Agency (EPA) had issued a final rule under Section 8(d) of the Toxic Substances Control Act requiring manufacturers, including importers, of sixteen specific chemicals to submit unpublished health and safety studies to the agency. EPA identified fifteen of these chemicals as potential candidates for prioritization based on hazard, exposure (including uses), persistence, and bioaccumulation characteristics. The initial reporting deadlines have been extended. The reporting deadline for vinyl chloride is now 11 June 2025, and for the other fifteen chemicals it is 9 September 2025.

The rule mandated that manufacturers and importers of the sixteen listed chemicals must report unpublished studies on health effects, environmental effects, and occupational, general population, and consumer exposure. The chemicals subject to the rule are:

- 4,4-methylene bis(2-chloraniline) (CAS No. 101-14-4)
- 4-tert-octylphenol(4-(1,1,3,3-Tetramethylbutyl)-phenol) (CAS No. 140-66-9)
- acetaldehyde (CAS No. 75-07-0)
- acrylonitrile (CAS No. 107-13-1)
- benzenamine (CAS No. 62-53-3)
- benzene (CAS No. 71-43-2)
- bisphenol A (CAS No. 80-05-7)
- ethylbenzene (CAS No. 100-41-4)
- hydrogen fluoride (CAS No. 7664-39-3)
- N-(1,3-Dimethylbutyl)-N'-phenyl-p-phenylenediamine (6PPD; CAS No. 93-24-8)
- 2-anilino-5-[(4-methylpentan-2-yl) amino]cyclohexa-2,5-diene-1,4-dione (6PPD-quinone; CAS No. 2754428-18-5)
- naphthalene (CAS No. 91-20-3)
- styrene (CAS No. 100-42-5)
- tribomomethane (bromoform; CAS No. 75-25-2)
- triglycidyl isocyanurate (CAS No. 2451-62-9)
- vinyl chloride (CAS No. 75-01-4)

The rule clarifies that there is no ten-year limit on retrospective study search dates. Further information regarding public comments on the proposed rule and the EPA's responses can be found here.

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Reopening of public comment period for the draft risk evaluation of dicyclohexyl phthalate (consultation)

On 13 March 2025, the US Environmental Protection Agency (EPA) announced the reopening of the public comment period for its draft risk evaluation of dicyclohexyl phthalate (DCHP; CAS No. 84-61-7) under the Toxic Substances Control Act (TSCA). The draft risk evaluation, initially published on 7 January 2025, assesses whether DCHP presents unreasonable risks to human health or the environment. The comment period, originally set to close on 10 March 2025, has been extended by 60 days to 9 May 2025 to allow stakeholders additional time to review materials and provide input. DCHP is used in adhesives and sealants, coating products, fillers, putties, plasters, modelling clay, finger paints, non-metal-surface treatment products, inks and toners, polishes and waxes, polymers and textile treatment products and dyes.

EPA had published a draft risk evaluation that incorporates biomonitoring data and cumulative exposure assessments to determine whether DXHP presents unreasonable risks to human health or the environment. DCHP, widely used as a plasticizer in adhesives, plastics, rubber, and resins, has been preliminarily found to pose unreasonable risks to workers, particularly due to developmental toxicity (phthalate syndrome). Of the twenty-four conditions of use (COUs) evaluated, nine COUs raised concerns for occupational exposure, whereas no unreasonable risks were identified for consumers or the environment. This evaluation aligns with previous assessments conducted by Health Canada, the US Consumer Product Safety Commission, the European Chemicals Agency, and the Australian National Industrial Chemicals Notification and Assessment Scheme. Comments were due on 10 March 2025.

Following the public comment period, EPA will finalize the risk evaluation. If the final determination concludes that DCHP presents an unreasonable risk, EPA will initiate risk management measures under TSCA Section 6, which may include regulatory restrictions, labeling requirements, recordkeeping, exposure controls, or prohibitions on certain uses.

Amendments to the National Emission Standards for Hazardous Air Pollutants (consultation)

The United States Environmental Protection Agency (EPA) is proposing amendments to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical Manufacturing Area Sources (CMAS). The proposal includes the creation of a new area source category for chemical manufacturing process units (CMPUs) using ethylene oxide (EtO). The deadline for comments was 24 March 2025.

Key changes include:

- EtO requirements – EPA intends to add EtO to the list of hazardous air pollutants (HAPs) regulated under CMAS NESHAP, introducing new requirements such as fence line monitoring
- new requirements for pressure relief devices (PRDs) and pressure vessels
- introduction of requirements for electronic reporting of compliance data

The proposal also presents the results of EPA's technology review of the CMAS NESHAP as required under the Clean Air Act (CAA).

The source categories subject to this proposal include but are not limited to the following:

- Chemical Manufacturing with Ethylene Oxide
- Cyclic Crude and Intermediate Production
- Industrial Inorganic Chemical Manufacturing
- Industrial Organic Chemical Manufacturing
- Inorganic Pigments Manufacturing

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- Miscellaneous Organic Chemical Manufacturing
- Plastic Materials and Resins Manufacturing
- Synthetic Rubber Manufacturing

EPA estimates a reduction of 158 tons per year (tpy) of HAP emissions, excluding EtO, and an additional reduction of 4.6 tpy of EtO emissions due to the proposed EtO standards.

In addition, EPA has proposed amendments to NESHAP for the polyether polyols (PEPO) production industry. These amendments aim to strengthen emission standards, particularly for EtO. Key proposed changes include requiring performance testing every five years, implementing work practice standards for specific activities, and introducing electronic reporting requirements. Additionally, EPA plans to remove certain exemptions and clarify existing provisions to enhance compliance and enforcement. EPA initially published these proposed amendments on 27 December 2024 and subsequently extended the public comment period to 18 March 2025 to allow stakeholders additional time to provide feedback.

Draft scope of the risk evaluation for vinyl chloride (published)

The US Environmental Protection Agency (EPA) has published a draft scope of the risk evaluation for vinyl chloride (CAS No. 75-01-4). It outlines the conditions of use, hazards, exposures, and potentially exposed or susceptible subpopulations that EPA expects to assess in its risk evaluation. Vinyl chloride, primarily used as a monomer in the production of polyvinyl chloride (aka PVC), has been classified as a known human carcinogen and is associated with liver toxicity, neurotoxicity, and immunotoxicity. The draft scope sets out the scientific approaches, conceptual exposure model, and analysis plan that will be used to assess risks under TSCA. Comments were due on 3 March 2025.

Following the public comment period, EPA will finalize the document. If the final evaluation determines that vinyl chloride presents an unreasonable risk, EPA will initiate risk management measures under TSCA Section 6, which may involve regulatory restrictions, labeling requirements, recordkeeping, exposure controls, or prohibitions on certain uses.

Extending comment period for two proposed rules to 24 March 2025: Toxics Release Inventory (TRI) Clarification Rule (90 FR 5795) and Clean Water Act Methods Update Rule 22 (90 FR 6967) (consultation)

On 21 February 2025, the Environmental Protection Agency (EPA) announced the reopening of the comment periods for two proposed rules originally published in January 2025. The comment periods, which closed on 18 February 2025 and 20 February 2025, were extended to 24 March 2025 to allow additional time for public input. Comments previously submitted remain part of the public record and did not need to be resubmitted.

Toxics Release Inventory (TRI) Clarification Rule (90 FR 5795, 17 January 2025)
This rule proposes regulatory amendments to TRI regulations to explicitly include per- and polyfluoroalkyl substances (PFAS) added to the TRI chemical list under the National Defense Authorization Act (NDAA). The NDAA mandates that certain PFAS be automatically added to the TRI list beginning 1 January of the year following specific triggering events. The proposed amendments confirm that supplier notification requirements apply to NDAA-added PFAS, requiring suppliers to notify customers of TRI-listed chemicals in mixtures or trade name products with the first shipment of each calendar year.

Clean Water Act Methods Update Rule 22 (90 FR 6967, 21 January 2025)
This rule proposes updates to the Clean Water Act's approved methods for analyzing contaminants in effluent. The rule introduces new EPA methods for detecting PFAS and polychlorinated biphenyl (PCB) congeners. It incorporates methods from voluntary consensus bodies for use in National Pollutant Discharge Elimination System permit reporting. EPA proposes to withdraw seven Aroclor (PCB mixtures) parameters from the approved methods list. The rule also includes simplified sampling requirements for two volatile organic compounds and minor corrections to existing methods tables.

OCEANIA

Australia

2024-2025 workplan to identify industrial chemicals that will be considered for scheduling under the Industrial Chemicals Environmental Management Standard (published)

The Australian Department of Climate Change, Energy, the Environment, and Water (DCCEEW) has outlined its 2024-2025 workplan under the Industrial Chemicals Environmental Management Standard (IChEMS) Scheduling Strategy. The workplan identifies industrial chemicals that will be considered for scheduling based on their level of environmental risk.

The IChEMS Scheduling Strategy, effective from 2024, provides general directions and priorities for establishing environmental management standards for industrial chemicals. Chemicals are categorized into seven schedules, with Schedules 6 and 7 listing chemicals of the highest concern, which may be subject to strict restrictions or prohibitions, while Schedules 1-5 include chemicals of lower concern.

IChEMS scheduling decisions assign risk-based measures for the safe use, storage, handling, and disposal of industrial chemicals. Tighter standards apply to higher-risk chemicals, which may include prohibitions or restrictions where necessary.

For the 2024-2025 financial year, chemicals expected to be considered for scheduling include:

- known and emerging chemicals of concern:
  - decabromodiphenylethane (CAS No. 84852-53-9)
- internationally recognized chemicals of concern – Minamata Convention:
  - mercury (CAS No. 7439-97-6)
  - mercury(I) chloride (CAS No. 10112-91-1)
  - mercury(II) chloride (CAS No. 7487-94-7)
  - mercury(I) oxide (CAS No. 15829-53-5)
  - mercury(II) oxide (CAS No. 21908-53-2)
  - mercury(I) sulfate (CAS No. 7783-36-0)
  - mercury(II) sulfate (CAS No. 7783-35-9)
  - mercury(II) nitrate (CAS No. 10045-94-0)
  - mercury(II) sulfide (CAS No. 1344-48-5)
- internationally recognized chemicals of concern – Rotterdam Convention:
  - tetraethyl lead (CAS No. 78-00-2)

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  - tetramethyl lead (CAS No. 75-74-1)
  - 1,2-dibromoethane (CAS No. 106-93-4)
  - 1,2-dichloroethane (CAS No. 107-06-2)
  - tris(2,3-dibromopropyl) phosphate (CAS No. 126-72-7)
- alternatives to internationally recognized chemicals of concern – Rotterdam Convention:
  - methylcyclopentadienyl manganese tricarbonyl (CAS No. 12108-13-3)
- lower concern chemicals:
  - various chemicals to be added to Schedules 1-4, including chemical alternatives to high-concern substances and new chemicals introduced to the Australian market

The IChEMS Scheduling Strategy also identifies chemicals expected to be prioritized for future consideration, including:

- internationally recognized chemicals of concern – Stockholm Convention:
  - long-chain perfluorocarboxylic acids (C9-C21)
  - medium-chain chlorinated paraffins (CAS No. 85535-85-9)
- internationally recognized chemicals of concern – substances restricted in other countries (Canada, the European Union, and the United States of America):
  - nonylphenol (CAS No. 25154-52-3)
  - nonylphenol ethoxylates and their sulfate and phosphate esters
- internationally recognized chemicals of concern – Rotterdam Convention:
  - commercial octabromobiphenyl (CAS No. 27858-07-7)
  - commercial decabromobiphenyl (CAS No. 13654-09-6)
- internationally recognized chemical of concern – perfluorinated substances restricted in other countries:
  - perfluoro-4-ethylcyclohexane sulfonate (CAS No. 646-83-3)

The IChEMS Minimum Standards, which set baseline environmental management requirements, apply to all chemicals listed in the IChEMS Register.

Public consultation is part of the standard-setting process, allowing stakeholders – including importers, manufacturers, exporters, and users of industrial chemicals – to provide input on feasibility and compliance. Stakeholders can also request that commercially sensitive or confidential information not be publicly disclosed.

Information requirements for assessment certificate applications for designated fluorinated chemicals (consultation)

The Australian Industrial Chemicals Introduction Scheme (AICIS) has opened a consultation on information requirements for assessment certificate applications for designated fluorinated chemicals. These chemicals are a subset of per- and polyfluoroalkyl substances (PFAS). They include longer-chain PFAS chemicals that are structurally similar to perfluorooctane sulfonic acid, perfluorooctanoic acid (PFOA), and perfluorohexane sulfonic acid (PFHxS). The consultation seeks feedback on the clarity of the information requirements that may be added to the AICIS assessment certificate application form.

Currently, the full set of information requirements is not included in the application form or published on the AICIS website. Instead, applicants must contact AICIS to obtain this information, which may lead to additional requests after a submission. AICIS is consulting on whether making these requirements publicly available in the application form and guidance documents would improve clarity for applicants.

The requirements include toxicological studies, details on impurities, and degradation product information. Following the consultation, AICIS will review feedback before deciding on any updates to the application form and supporting guidance.

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