Newsletter

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

IAEG

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NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 4 – 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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  RETURN TO TABLE OF CONTENTS

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 4 – 2025

IAEG INTERNATIONAL AEROSPACE ENVIRONMENTAL GROUP

TABLE OF CONTENTS

  RETURN TO TABLE OF CONTENTS

  RETURN TO TABLE OF CONTENTS

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 4 – 2025

  RETURN TO TABLE OF CONTENTS

ASIA

China

Safety requirements for toxic, harmful, and restricted substances in personal protective equipment (draft)

On 13 March 2025, China notified the World Trade Organization (WTO) of a draft national standard titled "National Standard of the P.R.C., Requirements for toxic, harmful and restricted substance in personal protective equipment" (PPE). Issued by the State Administration for Market Regulation, the draft is intended to replace three existing recommended standards, GB/T 31420-2015, GB/T 31419-2015, and GB/T 31009-2020, and transition to a mandatory national standard (i.e., GB).

The draft sets out safety requirements for toxic, harmful, and restricted substances across various categories of PPE, including head, face/eye, hearing, respiratory, clothing, hand, foot, and fall protection. It introduces specific concentration limits for substances such as lead, cadmium, chromium (VI), phthalates, formaldehyde, poly aromatic hydrocarbons (i.e., PAHs), azo dyes, chlorinated phenols, and organotin compounds.

Key changes include the removal of certain test methods and indicators found in the previous standards, such as tests for volatile content, chlorophenols, and nickel, and the addition of expanded safety requirements for hazardous substances. The document specifies tailored testing methods for different materials used in PPE components, including textiles, leather, plastics, and metals. Detailed substance limits are outlined in individual tables for each PPE category, including thresholds such as ≤1000 milligrams per kilogram total lead for head protection.

These updates affect manufacturers by mandating stricter compliance with safety standards and testing protocols. The annexes provide standardized sampling and analytical procedures, particularly for heavy metals and hazardous chemicals in components like protective footwear.

Update to the Hong Kong Ozone Layer Protection Ordinance (published)

On 11 April 2025, Hong Kong published an amendment to update the Ozone Layer Protection Ordinance to align with the Kigali Amendment to the Montreal Protocol. The Hong Kong Ozone Layer Protection Ordinance was enacted on 1 July 1989 and gives effect to Hong Kong's international obligations under the 1985 Vienna Convention for the Protection of the Ozone Layer and the 1987 Montreal Protocol on Substances that Deplete the Ozone Layer. The Montreal Protocol is structured around several groups of halogenated hydrocarbons that have been shown to play a role in ozone depletion. The annexes to the protocol contain different groups of chemicals classified as ozone depleting substances (ODS).

This amendment aims to better implement the Montreal Protocol by introducing controls on hydrofluorocarbons with high global warming potential and ensuring the safe handling of hazardous refrigerants. The amendment includes provisions for:

- controlling ODS and hydrofluorocarbons
- regulating products and equipment containing these substances
- ensuring safe handling of hazardous refrigerants

  RETURN TO TABLE OF CONTENTS

Specific changes include amendments to sections related to manufacturing, importing, exporting, licensing, and registration of scheduled substances, as well as the introduction of penalties for non-compliance. Non-compliance with the regulations can result in fines of up to $200,000 and imprisonment for six months, with additional fines for continuing offences.

India

Deferring of quality control orders for vinyl acetate monomer, methyl acrylate, and ethyl acrylate (published)

The Indian Department of Chemicals and Petrochemicals issued a notice on 1 April 2025 to defer quality control orders (QCOs) for vinyl acetate monomer (CAS No. 108-05-4), methyl acrylate (CAS No. 96-33-3), and ethyl acrylate (CAS No. 140-88-5), with a revised date of implementation of 31 March 2026. The changes have been implemented following feedback from industry seeking extensions. These amendments would modify the timeline for industries to meet the standards laid down under the respective QCOs. The application of these QCOs requires stakeholders to ensure they conform to the relevant quality standards, but companies can continue to produce and trade the substances based on the existing standards until the new orders come into force.

More information on QCOs can be found in this Alert from IAEG.

Japan

Inaugural sustainability disclosure standards (published)

On February 19, 2025, the Sustainability Standards Board of Japan (SSBJ) approved its first set of sustainability disclosure standards, which were officially issued on March 5, 2025. These standards include the Application Standard, General Standard, and Climate Standard, aligning with the International Sustainability Standards Board (ISSB) framework to enhance transparency and comparability in corporate sustainability reporting. The new requirements are expected to impact companies listed on Japan's Prime Market, reinforcing the importance of standardized ESG disclosures.

While the SSBJ has not explicitly outlined financial penalties for non-compliance, failure to adhere to the standards could result in regulatory scrutiny and reputational risks for companies. Given the increased global emphasis on sustainability reporting, businesses should closely monitor further guidance from the SSBJ to ensure compliance and mitigate potential risks associated with non-disclosure or inadequate reporting.

More information can be found here in Japanese.

Addition of 157 chemicals to the list of newly announced chemical substances, safety data sheet requirements or 155 chemicals, and addition of 49 chemicals to the list of carcinogenic substances (published)

On 27 March 2025, Japan's Ministry of Health, Labor, and Welfare (MHLW) announced the addition of 157 substances to its list of newly announced chemical substances under the Industrial Safety and Health Act (ISHA). This update exempts

  RETURN TO TABLE OF CONTENTS

manufacturers and importers from the requirement to notify the ministry for these substances, streamlining the compliance process. The list includes the names, chemical structures, and ISHA numbers of the substances.

In addition, MHLW has added 155 chemicals to the list of substances requiring safety data sheets (SDS) and globally harmonized system (GHS)-based labels. Furthermore, 49 substances have been added to the list of carcinogenic substances that necessitate workplace risk assessment records.

MHLW publishes newly announced chemical substances quarterly, including detailed information such as chemical names, structures, and assigned ISHA numbers. The substances requiring SDS and GHS-based labels are listed with their English names, CAS numbers, and applicable cut-off values. The list of carcinogenic substances includes those classified as category 1 for carcinogenicity.

For the 157 newly announced chemical substances, manufacturers and importers are no longer required to notify MHLW before production or importation. The 155 substances added to the SDS and labeling list must have appropriate SDSs and GHS-compliant labels provided when handled in the workplace. The 49 newly listed carcinogenic substances require companies to maintain records of workplace risk assessments, safety measures implemented, and workers' exposure for a period of 30 years. This requirement applies to substances classified as category 1 for carcinogenicity under ISHA. There are no penalties associated with this update.

More information can be found here in Japanese.

South Korea

Partial revision of the "Regulations on Classification and Labeling of Chemical Substances" (effective)

On 19 March 2025, the National Institute of Chemical Safety (NICS) in South Korea issued Notice No. 2025-7 (can also be found here in Korean) to partially revise the "Regulations on Classification and Labeling of Chemical Substances." This amendment modifies the hazardous chemical classification and labelling list in Annex 4 of the regulation.

The update removes the unique number "06-5-7" from the category of restricted substances and revises the listing for banned substances (Annex 4). Specifically, six types of asbestos are newly or explicitly designated as prohibited substances:

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

All substances above are classified for "Carcinogenicity (3.6)" and "Specific Target Organ Toxicity – Repeated Exposure (3.9)" with the following hazard codes:

- GHS08
- signal word: Danger
- hazard statements: H350 (may cause cancer)
- H372 (causes damage to organs through prolonged or repeated exposure)

Penalties are not mentioned in the update.

The Ministry of Employment and Labor lists seventy-two newly registered substances (published)

In March 2025, the South Korean Ministry of Employment and Labor (MOEL) published an official list of newly registered chemical substances for the first quarter of the year. The list details seventy-two newly manufactured or imported chemical substances. It includes comprehensive information on each substance's health and environmental hazard classifications, as well as recommended workplace safety measures intended to minimize risks to worker health and safety. Notably, thirty-two of the substances were classified as hazardous, with varying degrees of toxicity identified. Penalties are not mentioned in the update.

More information, including a list of the seventy-two substances, can be found here in Korean.

Vietnam

National Action Plan to implement circular economy by 2035 (published)

The Prime Minister of Vietnam issued a decision to implement a National Action Plan for a circular economy by 2035. This plan aims to harmonize economic growth and development with environmental protection, contributing to a green economy and sustainable development, in response to global challenges such as climate change and resource scarcity. It builds upon the Law on Environmental Protection dated 17 November 2020 and Decree No. 08/2022/ND-CP detailing articles of this law.

The National Action Plan provides a roadmap for implementing a circular economy in Vietnam, outlining viewpoints, goals, tasks, and solutions across various sectors. It prioritizes the circular economy to enhance economic resilience, promote innovation, improve competitiveness, and create new value chains while harmonizing the economy and the environment. The plan sets general objectives for a sustainable production and consumption structure, efficient resource use, waste minimization, and the development of circular economy models, aiming to foster a green culture and lifestyle.

By 2030, specific targets include increasing the capacity of power plants using biomass and solid waste, striving for resource efficiency comparable to leading ASEAN[1] countries, treating over 70% of wastewater from industrial establishments, and significantly increasing the collection and treatment rates of urban (95%) and rural (80%) solid waste while reducing the proportion of directly landfilled waste to below 50%.

By 2035, the plan envisions an inclusive circular economy, extending the life of materials, and developing sustainable value chains. Priority sectors for circular economy implementation by 2035 include agriculture, energy, mineral exploitation, manufacturing, chemicals, construction, transportation, services, tourism, waste management, and the development of urban and industrial areas.

The plan details numerous tasks and solutions encompassing awareness raising, institutional and policy development, support for circular economy application in production and consumption (including ecological design and industrial symbiosis), strengthened waste management, and enhanced linkage, cooperation, monitoring, and evaluation.

[1] i.e., the Association of Southeast Asian Nations.

  RETURN TO TABLE OF CONTENTS

The state plays a central role in creating the institutional environment and encouraging the participation of all economic sectors. Ministries, provincial governments, and relevant organizations are tasked with issuing specific guidelines, plans, and standards to fulfil the objectives of this roadmap. This decision enters into force on 23 November 2025, the date it was signed by the Prime Minister.

Additional information can be found here in Vietnamese.

EUROPE

European Union

Regulation (EU) 2025/486 sets out rules concerning the status of authorized declarants under the Carbon Border Adjustment Mechanism (effective)

On 18 March 2025, the European Commission published Implementing Regulation (EU) 2025/486 (the Regulation), which entered into force on 19 March 2025 and started applying from 28 March 2025. This Regulation sets out rules for the application of Regulation (EU) 2023/956 concerning the status of authorized CBAM declarants under the Carbon Border Adjustment Mechanism (CBAM). An authorized CBAM declarant is an importer or indirect customs representative authorized to introduce CBAM-covered goods into the European Union (EU) customs territory and fulfil associated obligations, including submitting annual CBAM declarations and surrendering CBAM certificates based on embedded emissions.

The Regulation outlines the application procedure, to be completed electronically via the CBAM registry, and specifies the information required, such as financial and operational capacity, legal compliance history, and estimated import volumes. Applications must generally be assessed by the competent authorities within 120 calendar days, extended to 180 days for those submitted before 15 June 2025. Importers of electricity subject to Article 5(4) of Regulation (EU) 2023/956 are automatically regarded as authorized CBAM declarants but must notify the competent authority.

Additional provisions address the reassessment of authorized status, revocation procedures in cases of serious or repeated infringements, and the management of guarantees. The Regulation also includes safeguards for personal data processed during the authorization process.

Penalties are not specified in this Regulation. However, in accordance with Article 26 of Regulation (EU) 2023/956, Member States are responsible for establishing penalties for non-compliance, which may include fines and must be effective, proportionate, and dissuasive.

  RETURN TO TABLE OF CONTENTS

Explanatory guide on Regulation (EU) 2023/2055 restricting microplastics intentionally added to products (published)

The European Commission has prepared an Explanatory Guide to assist stakeholders and European Union (EU) countries in implementing Regulation (EU) 2023/2055, which restricts synthetic polymer microparticles (microplastics) intentionally added to products. The guide clarifies the provisions and supports the implementation of the rules that apply from 17 October 2023. Developed in consultation with the European Chemicals Agency (ECHA) and EU countries, it will be updated as needed.

The guide targets non-biodegradable, insoluble plastic glitter and other microplastics intentionally added to mixtures. It comprises three sections:

- Part I – a narrative explanation of the restriction's provisions and intended implementation, to be translated into twenty-two EU languages and published during Q3 2025
- Part II – a questions and answers section compiling replies provided to EU countries and stakeholders
- Part III – annexes with decision trees and examples of borderline cases

The guide is not legally binding. Only the Court of Justice of the European Union can provide authoritative interpretations of EU law. ECHA will manage future updates to the guide.

Highlights of the March 2025 Committee for Risk Assessment and Committee for Socio-Economic Analysis meetings (published)

On 19 March 2025, the European Chemicals Agency (ECHA) published highlights from the March 2025 meetings of the Committee for Risk Assessment (RAC) and the Committee for Socio-Economic Analysis (SEAC). RAC and SEAC continued evaluating the proposed European Union-wide restriction on per- and polyfluoroalkyl substances (PFAS), reaching provisional conclusions for applications involving fluorinated gases, transport, and energy.

SEAC is scheduled to continue discussions on transport and energy applications in June. Upcoming evaluations in June will cover lubricants, energy, and electronics and semiconductors (with an introductory discussion held in RAC's March meeting). Further focus on electronics and remaining applications is expected after June.

RAC also adopted thirteen opinions on harmonized classification and labeling, including:

- silver nitrate (EC No. 231-853-9; CAS No. 7761-88-8): proposed classification as repr. 1B (fertility and development), carc. 2, and other hazard classes
- synthetic amorphous silica (EC No. 601-216-3; CAS No. 112945-52-5): proposed classification as STOT RE 1 for respiratory tract damage via inhalation

Additionally, RAC and SEAC advanced applications for authorization by adopting four final opinions and three review report opinions, alongside seventeen and six draft opinions, respectively.

Corrigendum to Regulation (EU) 2024/573 on fluorinated greenhouse gases (published)

On 24 March 2025, the European Union issued a corrigendum to Regulation (EU) 2024/573 on fluorinated greenhouse gases (F-gases). The corrigendum introduces targeted corrections to article references and wording throughout the regulation to improve clarity and ensure legal consistency. The corrections affect provisions concerning personnel

  RETURN TO TABLE OF CONTENTS

certification, product labeling, switchgear specifications, import/export licensing, and delegated powers. No changes are made to the implementation dates or the scope of regulated substances and equipment as originally established in Regulation (EU) 2024/573, which has been in force since 11 March 2024.

Penalty provisions remain as defined in Regulation (EU) 2024/573.

Harmonized classification and labeling updates (announced)

On 25 March 2025, the European Chemicals Agency (ECHA) updated the registry of harmonized classification and labeling (CLH) intentions with proposals submitted by Norway for two substances, both of which are registered under REACH.

The first substance is 1,1,2,2,3,3,4,4,4-nonafluorobutane-1-sulphonic acid (EC No. 206-793-1, CAS No. 375-73-5), a perfluoroalkyl compound, which is proposed for classification under the environmental hazard category "persistent, mobile, toxic/ very persistent, very mobile" (PMT/vPvM). The substance is known for its environmental persistence and mobility, contributing to long-term contamination risks. The proposal is part of efforts to manage substances with PMT/vPvM profiles. The expected dossier submission is 1 July 2025.

The second substance is dimethylsilanediol (EC No. 213-915-7, CAS No. 1066-42-8). The proposal for this silicon-based compound includes classification under "reproductive toxicity" and PMT/vPvM. This dual hazard identification addresses both potential health effects and environmental concerns, particularly related to long-term exposure and environmental accumulation. The expected dossier submittal is on 1 December 2025.

ECHA has also opened three CLH consultations and announced two new CLH intentions as detailed below. If the classifications are approved, new labeling and classification requirements might apply.

Butan-2-one O,O',O''-(methylsilylidyne)trioxime (EC No. 245-366-4; CAS No. 22984-54-9), butan-2-one O,O',O''-(vinylsilylidyne)trioxime (EC No. 218-747-8; CAS No. 2224-33-1), and butan-2-one O,O',O'',O'''-silanetetrayltetraoxime (EC no. 251-882-0; CAS no. 34206-40-1) consultation (open until 30 May 2025). These three substances are used as part of the composition of sealant and coating products. The proposed CLH classification is:

- carc. 1B, H350
- STOT SE 3, H336
- STOT RE 2, H373 (blood system)
- skin sens. 1, H317

2-butanone-O,O',O''-(phenylsilylidyne)trioxime (EC no. 433-360-6; CAS no. 34036-80-1) consultation (open until 30 May 2025). This substance is used as part of the composition of sealant and coating products. The proposed new CLH classification is:

- carc. 1B, H350
- STOT SE 3, H336
- STOT RE 2, H373 (blood system)
- skin sens. 1A, H317

1-(5,6,7,8-tetrahydro-3,5,5,6,8,8-hexamethyl-2-naphthyl)ethan-1-one (EC Nos. 216-133-4 & 244-240-6; CAS Nos. 1506-02-1 & 21145-77-7) consultation (open until 30 May 2025). This substance is used in washing and cleaning products, air care products, and polishes and waxes. The proposed new CLH classification is:

- repr. 1B, H360Df
- STOT RE 2, H373 (liver, thyroid)
- aquatic acute 1, H400a
- aquatic chronic 1, H410
- aquatic acute 1, M-factor=1
- aquatic chronic 1, M-factor=1

In addition, 1,1,2,2,3,3,4,4,4-nonafluorobutane-1-sulphonic acid (EC No. 206-793-1; CAS No. 375-73-5) and dimethylsilanediol (EC No. 213-915-7; CAS No. 1066-42-8) have been added to the registry of CLH intentions until outcome. The

  RETURN TO TABLE OF CONTENTS

tentative proposed new CLH classifications are PMT/vPvM for 1,1,2,2,3,3,4,4,4-nonafluorobutane-1-sulphonic acid, and reproductive toxicity, PMT/vPvM for dimethylsilanediol. Once the CLH dossiers for these intentions are submitted and the accordance check carried out, consultations will be opened on the final proposed new CLH classifications.

In addition, on 17 March 2025, ECHA launched a public consultation on proposals for new or updated harmonized classification and labelling (CLH) of two substances (comments due on 16 May 2025).

Submitted by Finland, 5-methylhexan-2-one; isoamyl methyl ketone (EC No. 203-737-8, CAS No. 110-12-3) is currently classified under CLP Annex VI as:

- flam. liq. 3 (H226)
- acute tox. 4* (H332)

The proposed harmonized classification introduces an additional classification – repr. 2, H361d. Two hazard classes are open for commenting: "acute toxicity" and "reproductive toxicity."

Submitted by France, 2-[(1R,6R)-3-methyl-6-prop-1-en-2-ylcyclohex-2-en-1-yl]-5-pentylbenzene-1,3-diol; cannabidiol (EC No. 689-176-3; CAS No. 13956-29-1) currently has no harmonized classification. The proposed new classification is:

- repr. 1B, H360FD
- lact., H362

The hazard class open for commenting is "reproductive toxicity".

Initiative to review Regulation (EU) 2019/1148 on the marketing and use of explosives precursors (consultation)

The European Commission has opened a consultation for an initiative aiming to review Regulation (EU) 2019/1148 on the marketing and use of explosives precursors, to check if it is still working as intended and if any changes are needed. The consultation aims to gather views on:

- the implementation of the Regulation, in particular its effectiveness, efficiency, European Union added value, relevance, coherence, and impact on fundamental rights and freedoms
- the scale of the threat from alternative explosives precursors
- ways of controlling alternative explosives precursors
- the functioning of the single market for explosives precursors

The deadline for comments is 23 June 2025.

Updates to Regulation 440/2008 on approved methods for testing chemicals under REACH methods (consultation)

The European Commission opened a consultation for an initiative aiming to update Regulation 440/2008, which lists the approved methods for testing chemicals under REACH. Comments were due on 1 May 2025. The initiative will add several new/updated methods to Regulation 440/2008's list, with the aim of reducing or refining the amount of animal testing using chemicals.

Reduction of regulatory burdens within the European Union defense sector (consultation)

The European Commission launched a consultation on the Defense Omnibus Simplification Proposal (comments were due 22 April 2025), aiming to reduce regulatory burdens within the European Union (EU) defense sector. This initiative seeks to streamline rules related to procurement, licensing, and funding mechanisms, particularly for cross-border defense projects and the European Defense Fund. Stakeholders – including defense companies, industry groups, and EU Member States – are invited to provide feedback by April 22, 2025. The final proposal could include changes affecting compliance requirements, and non-adherence may lead to operational and financial inefficiencies for defense contractors operating in the EU.

Updates to the European Union Emissions Trading System (draft)

The European Commission issued a draft Commission Delegated Regulation, dated 1 April 2025, to update and replace Delegated Regulation (EU) 2019/1603 to align the European Union (EU) Emission Trading System (ETS) with the International Civil Aviation Organization's (ICAO's) Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) for monitoring, reporting, and verification (MRV) of aviation emissions. It maintains EU ETS rules for intra-European Economic Area (EEA) flights and those to Switzerland and the United Kingdom, while applying CORSIA offsetting for EEA-based operators on other international flights during 2021-2023 and 2024-2026. The regulation introduces MRV rules for CORSIA eligible fuels and emissions unit cancellation reports, effective from January 1, 2024, to ensure compliance with Directive 2003/87/EC as amended by Directive (EU) 2023/958.

Aircraft operators must submit annual emissions reports and verified cancellation reports by 30 April 2025 for 2021-2023, and 30 April 2028 for 2024-2026, with Member States transmitting data to ICAO by 31 July 2025 and 31 July 2028, respectively. Operators track fuel purchases, avoiding double-claiming, with verification by accredited bodies. Under Directive 2003/87/EC, non-compliance with EU ETS or CORSIA obligations typically incurs fines or operational restrictions enforced by Member States.

Draft risk profiles for polybrominated dibenzo-p-dioxins and dibenzofurans and mixed polybrominated/chlorinated dibenzo-p-dioxins and dibenzofurans (consultation)

The European Chemicals Agency (ECHA) opened a consultation (comments due 20 May 2025) on a draft risk profile for polybrominated dibenzo-p-dioxins and dibenzofurans (PBDD/Fs) and mixed polybrominated/chlorinated dibenzo-p-dioxins and dibenzofurans (PBCDD/Fs). It excludes polychlorinated dibenzo-p-dioxins and dibenzofurans (PCDD/Fs).

These substances have been proposed to be added to Annex C to the Stockholm Convention on Persistent Organic Pollutants. As such, during the Convention process to add these substances to the Annex, the European Union will carry out consultations and consider all gathered information.

Rules on the operation of digital product passport service providers (consultation)

The European Commission is consulting on an initiative laying down rules on the operation of digital product passport (DPP) service providers. This initiative is being developed under the framework of the Ecodesign for Sustainable Products Regulation and aims to establish operational rules for service providers as a critical component of DPP governance.

  RETURN TO TABLE OF CONTENTS

The DPP is designed to facilitate access to digital information on products' sustainability, circularity, and legal compliance within the single market. The DPP will electronically register, process and share product information among supply-chain businesses, authorities and consumers, including on a product's sustainability and circularity. DPP service providers will store and process DPP data on behalf of responsible economic operators.

A call for evidence on this initiative took place from 12 November 2024 to 10 December 2024. This consultation aims to gather additional information as well as more detailed information on the views shared during the call for evidence. Considering all the information gathered, a draft act will then be published, and another consultation will be opened for it.

Proposed revisions to the European Sustainability Reporting Standards Set 1 (consultation)

On 8 April 2025, the European Financial Reporting Advisory Group (EFRAG) initiated a public consultation to gather stakeholder feedback on proposed revisions to the European Sustainability Reporting Standards (ESRS) Set 1. This initiative follows the European Commission's mandate on 27 March 2025, tasking EFRAG with providing technical advice for a delegated act aimed at simplifying and enhancing the ESRS. The consultation seeks insights into various aspects, including the relevance of mandatory data points, clarity of provisions, alignment with other European Union legislation, and the materiality assessment process. Comments were due on 6 May 2025.

Amendment to Annex XVII of Regulation (EC) No 1907/2006 (REACH) restricting use of per- and polyfluoroalkyl substances in firefighting foams (draft)

The European Commission (EC) published a draft amendment to restrict the use of per- and polyfluoroalkyl substances (PFAS) in firefighting foams across the European Union to address unacceptable risks to human health and the environment. The amendment aims to prevent environmental contamination caused by the persistence and mobility of PFAS, harmonize rules across the European Union, and avoid substitutions with other hazardous PFAS. It also seeks to ensure the availability of alternatives and establish measures for proper waste management and labeling to minimize emissions and facilitate compliance.

The EC has proposed a restriction on the use of PFAS in firefighting foams due to their environmental persistence and associated health risks. PFAS are highly mobile in the environment and have been linked to contamination of water sources and biota. The regulation will amend Annex XVII of Regulation (EC) No 1907/2006 (REACH), which sets restrictions on the manufacture, placing on the market, and use of certain hazardous substances, mixtures, and articles. This amendment specifically introduces new restrictions on PFAS in firefighting foams.

The regulation proposes a ban on the placing on the market and use of PFAS in firefighting foams with sector-specific transitional periods. It sets a concentration limit of 1 milligram per liter (mg/L) for PFAS in firefighting foams, with a higher limit of 50 mg/L for fluorine-free foams installed in cleaned equipment.

Italy

Motion 1-00419 regarding risks posed by per- and polyfluoroalkyl substances (presented)

On 21 March 2025, Motion 1-00419 was presented to the Italian Chamber of Deputies, highlighting the environmental and health risks posed by per- and polyfluoroalkyl substances (PFAS). The motion describes PFAS persistence in the

  RETURN TO TABLE OF CONTENTS

environment, their accumulation in tissues and vital organs, and widespread contamination in Italy, especially in Piedmont, Veneto, Lombardy, and Tuscany.

It recalls existing legislative frameworks such as Legislative Decree No. 172/2015 and Legislative Decree No. 18/2023, which introduced monitoring obligations and concentration limits for PFAS in water intended for human consumption. The motion also references EU Directive 2020/2184 and Italy's establishment of a Water Safety Centre and Dynamic Territorial Register of Drinking Water, with key risk assessment deadlines in 2027 and 2029 respectively.

The motion further notes the ongoing restriction proposal under REACH submitted by five European Union countries to the European Chemicals Agency (ECHA), the formation of a European Food Safety Authority (EFSA)-led PFAS Initiative Group, and updated toxicological findings by EFSA, the International Agency for Research on Cancer, and the United States Environmental Protection Agency.

More information can be found here in Italian.

Ireland

New limit values for lead and its inorganic compounds and for diisocyanates (consultation)

Ireland has opened a consultation on the implementation of Directive (EU) 2024/869 into national law. Directive (EU) 2024/869 amended Directive 2004/37/EC, the Carcinogens, Mutagens and Reprotoxic Substances Directive (CMRD), which sets minimum requirements for protecting workers against risks to their health and safety arising from exposure to carcinogens and mutagens at work. The amendment included lowering the limit values for occupational exposure to lead and its inorganic compounds and introducing limit values for diisocyanates.

Ireland is seeking the views of stakeholders and interested parties as the national legislation is currently being prepared to implement the European Directive. The consultation is open until 23 May 2025.

Update on the protection of workers from the risks related to exposure to asbestos at work (consultation)

Ireland has opened a consultation on the implementation of Directive (EU) 2023/2668 into national law. Directive (EU) 2023/2668 amended Directive 2009/148/EC on the protection of workers from the risks related to exposure to asbestos at work. The amendment introduced new safety measures for workers exposed to asbestos during their work, including new exposure limits and new detection and measurement methods.

Ireland is seeking the views of stakeholders and interested parties as the national legislation is currently being prepared to implement the European Directive. The consultation is open until 23 May 2025 (5pm local time).

United Kingdom

HSE publishes the UK REACH Report (2023 to 2024), Work Program (2024 to 2025), and Rolling Action Plan (RAP) for UK REACH 2024, 2025, and 2026 (published)

On 21 March 2025, the Health and Safety Executive (HSE) published three key documents under the UK REACH regulation applicable in Great Britain: the UK REACH Report (2023 to 2024), the Work Programme (2024 to 2025), and the Rolling Action Plan (RAP) for UK REACH 2024, 2025 and 2026.

The UK REACH Report outlines activities undertaken during the 2023 to 2024 work program. The 2024 to 2025 work program describes planned operational work and was developed by HSE and the Environment Agency in collaboration with the Department for Environment, Food, and Rural Affairs (i.e., Defra), as well as the devolved governments of Scotland and Wales (the Appropriate Authorities).

HSE published the RAP for 2024 to 2026 in accordance with Article 44 of UK REACH. This document lists substances selected for evaluation to assess potential risks to human health or the environment. The selection is based on prioritization criteria developed and agreed with the Appropriate Authorities.

Penalties are not mentioned in the update.

Draft risk profile of substances proposed as persistent organic pollutants (consultation)

On 26 March 2025, the Health and Safety Executive (HSE), through the Department for Environment, Food, and Rural Affairs (i.e., Defra), invited public comments on the draft risk profile for a group of substances proposed as persistent organic pollutants (POPs) under the Stockholm Convention (comments due 19 May 2025). The Stockholm Convention is a global treaty aimed at protecting human health and the environment from POPs, which are substances that persist in the environment, accumulate in living organisms, and pose serious risks.

The substances under review include polybrominated dibenzo-p-dioxins and dibenzofurans, as well as mixed polybrominated/chlorinated dibenzo-p-dioxins and dibenzofurans. These substances are being considered for inclusion in Annex C of the Convention. While not intentionally manufactured, they are unintentionally produced through thermal processes involving brominated flame retardants, such as the uncontrolled burning of waste containing polybrominated diphenyl ethers.

The draft RP analyses data from the original proposal and evaluates whether these substances meet the criteria for classification as POPs. It also reviews the recommendation for listing and outlines supporting evidence. This draft marks the second stage in the POPs review process and will be discussed at the next POP Review Committee meeting in Fall 2025.

Decisions on nine applications regarding chromium (VI) compounds for authorization under UK REACH (published)

On 10 April 2025, the Department for Environment, Food, and Rural Affairs (Defra) published decisions on nine applications for authorization under UK REACH. The decisions permit the time-limited use of chromium (VI) compounds, which are substances of very high concern (SVHCs), for applications in the aerospace and defense sector and its supply chains.

  RETURN TO TABLE OF CONTENTS

Authorized uses for members of the Aerospace and Defense Chromates Reauthorization Consortium (ADCR) include the formulation of mixtures with soluble sodium dichromate (EC No. 234-190-3; CAS No. 7789-12-0) for surface treatments; pre-treatments such as deoxidizing, pickling, etching, and desmutting;[2] slurry coating using chromium trioxide (EC No. 215-607-8; CAS No. 1333-82-0); anodize sealing with potassium dichromate (EC No. 231-906-6; CAS No. 7778-50-9), sodium dichromate, or sodium chromate (EC No. 231-889-5; CAS No. 7775-11-3); passivation of non-aluminum metallic coatings; and inorganic finish stripping using sodium dichromate.

Uses authorized for the Surface Engineering Association include hard (functional/engineering) chromium electroplating of components; in-house electroplating processes; and surface treatments including chromic acid anodizing, chromate conversion coating, passivation of non-aluminum metals, and sealing after anodizing.

Penalties are not mentioned in the update.

NORTH AMERICA

Canada

Certain Products Containing Toxic Substances Regulations targeting coal tars polycyclic aromatic hydrocarbons, and 2-butoxyethanol (in force)

On 12 March 2025, Canada published the Certain Products Containing Toxic Substances Regulations (the Regulations; SOR/2025-36), under the Canadian Environmental Protection Act, 1999 (CEPA). The Regulations target the environmental and human health risks associated with coal tars, polycyclic aromatic hydrocarbons (PAHs), and 2-butoxyethanol (2-BE) and repeals the 2-BE regulations.

The Regulations prohibit the manufacture and import of pavement, roofing, and certain industrial-use sealant products containing coal tars or PAHs above 1,000 parts per million after 1 October 2025. Sale of such products is prohibited after 31 December 2025, with exemptions for export-only products or those manufactured/imported under permit and sold within one year of the permit's expiry. A temporary exemption allows the continued sale of certain industrial-use coal tar-based sealants until 1 July 2028.

For products containing 2-BE, the Regulations set maximum concentration limits across various indoor-use product categories such as cleaners, paint strippers, and coatings. Manufacture, import, or sale above these limits is prohibited unless the product is intended for dilution with appropriate instructions, covered by a permit, for export, or in transit.

The Regulations outline permit requirements, accredited laboratory testing, electronic and certified submissions, and record-keeping obligations. Record-keeping requirements for coal tar and PAH-containing products apply starting 1 October 2025. Violations of key provisions are subject to enhanced fines under CEPA.

[2] Desmutting is use in chemical pretreatment after an alkaline etching process or a polishing process.

  RETURN TO TABLE OF CONTENTS

Designated provisions are subject to CEPA's enhanced fine range for non-compliance involving environmental harm or obstruction.

Proposed release guidelines for chemicals used in the rubber product manufacturing sector (consultation)

On 22 March 2025, a notice was issued in the Canada Gazette, Part I on the proposed release of guidelines for chemicals used in the rubber product manufacturing sector (comments due on 21 May 2025). The Minister of the Environment proposed the release to provide guidance and concentration targets to reduce industrial effluent releases of substances of concern. The guidelines would help reduce risks from certain chemicals used in the rubber product manufacturing (RPM) sector in Canada that have been concluded as toxic under the Canadian Environmental Protection Act, 1999 (CEPA).

Screening assessments were previously conducted under section 74 of CEPA for the following substances:

- N,N'-mixed phenyl and tolyl derivatives of 1,4-benzenediamine (BENPAT; CAS No. 68953-84-4)
- thioperoxydicarbonic diamide ([(H2N)C(S)]2S2), tetramethyl- (TMTD; CAS No. 137-26-8)

The assessments concluded that these substances meet one or more of the criteria set out in Section 64 of CEPA. On June 26, 2019, BENPAT was added to Schedule 1 of CEPA and on October 8, 2022, the Minister of the Environment published a statement indicating intention to recommend that TMTD be added to Schedule 1.

Chemicals used in the RPM sector include vulcanizing agents, accelerators, activators, protective agents (e.g. antioxidants and antiozonants), plasticizers, and process aids.

The guidelines apply to any person/entity who:

- owns or operates a rubber product manufacturing facility
- uses any of the substances of concern listed in Appendix 1 (Concentration Targets for Substances of Concern)
- releases an effluent containing any of the substances of concern

Affected stakeholders would be required to provide a conformity evaluation report for every year a substance of concern is used by June 1 of the following calendar year and should retain all records pertaining to the Guidelines for at least five years.

United States

Extending the reporting deadline under the Greenhouse Gas Reporting Rule (published)

The United States Environmental Protection Agency (EPA) has published the final rule to extend the reporting deadline under the Greenhouse Gas Reporting Rule (GHG Rule) to 30 May 2025. This rule only changes the reporting deadline for annual GHG reports for reporting year 2024. The final rule does not change the reporting deadline for future years, and it does not change the requirements for what regulated entities must report.

Significant New Use Rules on twenty-nine substances and substances groups (consultation)

The United States Environmental Protection Agency (EPA) has published a proposal to add 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. Twenty-nine substances and substance groups are included in this proposal. Comments were due on 5 May 2025.

The SNURs require persons who intend to manufacture, import, or process any of these chemical substances for an activity that is proposed as a significant new use to notify EPA at least 90 days before commencing that activity. This notification, known as Significant New Use Notice (SNUN), initiates EPA's evaluation of the conditions of that use for that chemical substance. Once the evaluation has been concluded, EPA might decide to regulate the use of the substance to ensure human health and the environment are protected. It is only after this final decision has been made that manufacture, import, or processing of the substance for that use can commence, subject to any established conditions.

OCEANIA

Australia

Draft evaluations for twenty-nine substances under the Australian Industrial Chemicals Introduction Scheme (consultation)

Consultations on draft evaluations for twenty-nine substances have been opened under the Australian Industrial Chemicals Introduction Scheme (AICIS). The AICIS regulates the importation and manufacture (introduction) of industrial chemicals in Australia.

Under AICIS, substance evaluations are carried out to determine if additional measures need to be taken to protect the health of workers from hazardous substances. Consultation is open until 29 May 2025 for stakeholders to submit comments on the conclusions of the evaluations.

The list of substances, their use and the proposed outcome of the evaluation can be accessed here.

Proposed Industrial Chemicals Environmental Management Standards for six chemical groups (consultation)

Australia's Department of Climate Change, Energy, the Environment, and Water has proposed Industrial Chemicals Environmental Management Standards (IChEMS) for the following chemical groups (comments were due on 9 May 2025):

- decabromodiphenyl ethane (CAS No. 84852-53-9)
- mercury (CAS No. 7439-97-6) and mercury compounds
- 1,2-dibromoethane (CAS No. 106-93-4)
- methylcyclopentadienyl manganese tricarbonyl (CAS No. 12108-13-3)

  RETURN TO TABLE OF CONTENTS

- 1,2-dichloroethane (CAS No. 107-06-2)
- aryl sulfonate hydrotropes (CAS Nos. 8-98-11-3, 515-42-4, and others)

IChEMS establishes standards for managing the import, manufacture, export, use and disposal of industrial chemicals to reduce the impact of industrial chemicals on the environment. The measures in these standards can include restrictions and bans, information requirements, labeling requirements, etc.

New Zealand

Restrictions on use of dechlorane plus, methoxychlor, and UV-328 (published)

New Zealand has amended the Hazardous Substances and New Organisms Act 1996 via the Schedules 1AA and 2A Order 2025 (the Order) which enters into force on 14 March 2025. This update adds three substances including dechlorane plus (CAS No. 13560-89-9), methoxychlor (CAS No. 72-43-5), and UV-328 (CAS No. 25973-55-1) to the regulatory framework in alignment with the Stockholm Convention, placing new restrictions on their production and use.

The Order aims to phase out persistent organic pollutants (POPs) known for their harmful environmental and health impacts. Dechlorane plus and UV-328 have been newly listed under Annex A of the Stockholm Convention, while methoxychlor has had its global ban formalized. All three substances now require stringent controls on production and use.

Dechlorane plus (and its isomers) is now prohibited from production, and its use is heavily restricted. New Zealand has introduced a new Part XI to Schedule 2A, outlining specific exemptions. These exemptions permit the continued use of Dechlorane plus in articles that were already in use before 26 February 2025, across sectors such as aerospace, defense, motor vehicles, power distribution, and certain medical and diagnostic devices. These exemptions are strictly limited to replacement parts or repairs and are time-bound—some expiring between 2030 and 2043, or at the end of the product's service life.

Methoxychlor (and related isomers) is now completely banned. Both its production and use are prohibited under the updated Schedule 1AA, with no exemptions or transitional allowances listed under Schedule 2A. This reflects the global ban already adopted under the Stockholm Convention due to methoxychlor's adverse environmental and health effects.

UV-328 has also been added to Schedule 1AA, with restrictions similar to dechlorane plus. While production is prohibited except for parties who have registered exemptions with the Stockholm Convention, specific uses are permitted under a newly created Part XII in Schedule 2A. These include limited exemptions for replacement parts in vehicles and stationary machines, as well as industrial coatings, photographic paper, and medical devices such as diagnostic LCD screens. Most exemptions will remain valid until 2043 or until the article reaches the end of its service life. The government plans to review all exemptions by 2041, meaning companies must begin planning for long-term substitution.

Impacts on companies will vary depending on the sectors they operate in. Businesses involved in importing or using any of these substances must assess their compliance status immediately. Industries likely to be affected include automotive and machinery servicing, aerospace and defense, industrial coating manufacturers, electronics and medical diagnostics, and power equipment suppliers. Companies using dechlorane plus and UV-328 must ensure their uses fall within the defined exemptions and maintain records to demonstrate compliance. Those still using Methoxychlor must cease all use and sourcing activities without delay.

This Order comes into force on 14 March 2025 and all exemptions for dechlorane plus and UV-328 must comply with specified expiry dates and may be reviewed by 2041. There are no exemptions for methoxychlor—its use is completely banned. Penalties for non-compliance have not been specified.

SOUTH AMERICA

Brazil

DECRETO N0. 12.438 regulating exceptions to the prohibition of importing solid waste (consultation)

DECRETO No. 12.438 regulates exceptions to the prohibition of importing solid waste as outlined in Law No. 12,305 of 2 August 2010. It specifies that while hazardous waste and certain other types are prohibited, the import of specific materials listed in an Annex,[3] such as certain plastics, rubber, and various metal scraps, is authorized for industrial processing. The decree also includes provisions for prioritizing domestic waste and the involvement of waste picker organizations, alongside criteria for revising the list of authorized imports and the requirement for competent bodies to monitor and fiscalize the regulations.

The decree prohibits the import of rejects of any nature, hazardous solid waste, and waste that can cause damage to the environment or sanitary integrity, except as provided in Article 49, § 2º, of Law No. 12.305. Furthermore, the import of solid waste is prohibited for any purpose other than the transformation of strategic materials and minerals in industrial processes, as stipulated in Article 49, caput and § 1º, of Law No. 12.305. An exception to the import prohibition is made for the return of waste previously exported by Brazil. However, the decree authorizes the import of specific waste types listed in its Annex, provided that the general prohibitions mentioned above (rejects, hazardous waste, environmental/sanitary damage, and purpose limitation) and any specific legislation are observed. Customs control bodies are mandated to adhere to the decree's provisions when authorizing waste imports.

The decree encourages industries that use waste as industrial inputs to prioritize waste available in the domestic market, particularly from cooperatives, associations, and other forms of popular organization of reusable and recyclable material pickers. This is intended to enhance reverse logistics systems and the implementation of the circular economy. This decree was signed on 17 April 2025 and entered into force on the date of its publication, which was 22 April 2025. Penalties are not mentioned in the update.

More information can be found in the Official Gazette of the Union.

[3] The Annex lists specific waste types by their Nomenclatura Comum do Mercosul (NCM) codes and descriptions that are authorized for import.

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