

WORK GROUP 9
INTERNATIONAL REGULATORY
WATCH: 50TH EDITION



Vol.5, Issue 5

CELEBRATING 50 ISSUES

IAEG is delighted to celebrate that this month's WG9 Newsletter is the 50th in the series, continuing to demonstrate the collaboration and reach of the IAEG member companies in understanding and communicating to members where regulations have a potential impact to members. The expansion to cover environmental, social, and governance legislation, not only global chemical regulations has been a significant change in recent months and it is hoped provides increased value to members. IAEG and WG9 members are grateful for the assistance of Yordas Group and Haley Aldrich in the research and creating of these newsletters.

~

Chris Lines, WG9 Board Sponsor

Each edition is crafted with precision, offering executive summaries that distill complex regulatory landscapes into actionable insights.

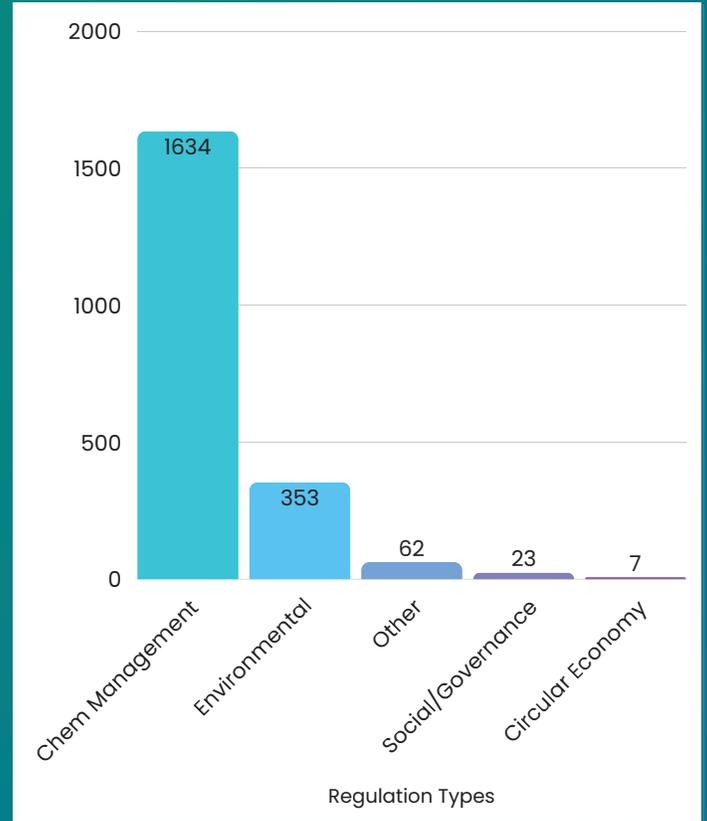
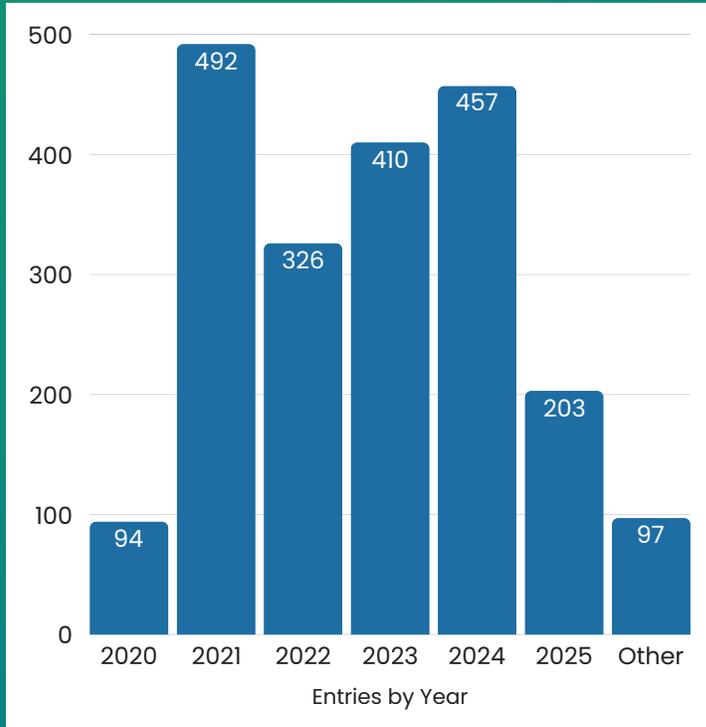
- **Global Regulation Tracking:** Our work group maintains an up-to-date list of global regulations, policies, and standards. This includes both current and emerging regulations, providing our readers with a comprehensive view of the regulatory environment.
- **Impact Evaluation:** We have developed a robust method for evaluating the potential impact of emerging regulations on compliance, operational risk, business continuity, and supply chain dynamics. This evaluation is crucial for our members to navigate regulatory changes effectively.
- **Timeline Summaries:** Each newsletter includes detailed summaries of the regulatory timelines, highlighting crucial deadlines and specific impacts. This feature helps our members plan and implement necessary compliance measures proactively.
- **Educational Outreach:** In addition to the newsletter, we produce communication materials and conduct informational webinars tailored for member companies and A&D supply chain companies. These initiatives enhance understanding and facilitate compliance across the industry.

As we celebrate this milestone, we remain committed to our mission of supporting the Aerospace and Defense industry through insightful and practical regulatory guidance. We are excited about the future and look forward to continuing our work with the same level of dedication.

Here's to many more editions of informed and engaged readership!

WORK GROUP 9

Milestone Metrics



NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 5 – 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.

SUBSCRIPTION SERVICE

IAEG also offers a subscription service to receive these newsletters once they become available for release. To subscribe click [here](#).

IAEG provides this newsletter with support from  and 

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies,
and Standards
Issue 5 – 2025



TABLE OF CONTENTS



GLOBAL 5

One hundred countries pledge to halve the health impacts of air pollution by 2040 (published)	5
The Greenhouse Gas Protocol adds five new Observing Entities to its Independent Standards Board (published)	5
Twelfth meetings of the Conference of the Parties to the Rotterdam and Stockholm Conventions (announced)	5
Amendments to International Financial Reporting Standards Sustainability Disclosure Standard 2 (consultation)	6



ASIA 7

China 7

Amendment to the Inventory of Existing Chemical Substances in China (amendment)	7
English version of the mandatory national standard for the restriction of hazardous substances in electrical and electronic products (published)	7
Administration of import and export of ozone depleting substances (in force)	8

India 8

Aluminum and Aluminum Alloy Products Quality Control Order (published)	8
Extension of implementation timeline for several Quality Control Orders (published)	9
Safety of Household, Commercial, and Similar Electrical Appliances (Quality Control) Order, 2025 (published)	9
Second revision to Indian Standard for ammonium nitrate (consultation)	10

Japan 10

Addition of seventy-eight substances to the workplace exposure limits list (published)	10
--	----

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies,
and Standards
Issue 5 – 2025



Malaysia.....10

Requirements for the export of chemicals to countries not parties to the Stockholm Convention
(published) 10

Singapore.....11

Updates to Second Schedule of the Environmental Protection and Management Act 1999 regarding
formaldehyde, dechlorane plus, and UV-328 (published) 11

South Korea.....11

Partial amendment to the Enforcement Rules of the Occupational Safety and Health Act (in force) 11

Vietnam12

Law to improve the management and safety of chemicals across their lifecycle (draft) 12



EUROPE..... 12

European Union12

Work plan to revise the European Sustainability Reporting Standards Set 1 (published) 12

Work plan to enhance circular and efficient products (published) 13

Adjustment to dates to apply certain corporate sustainability reporting and due diligence requirements
(published) 13

Technical specifications for the digital platform to report obligations under microplastics restrictions
(published) 13

Regulatory Technical Standards to enhance transparency and integrity of environmental, social, and
governance rating activities (consultation) 14

Restrictions on thirteen chromium VI substances (consultation) 14

Delegated Regulation amending Annex I of Regulation (EU) 2023/1115 (EU Deforestation Regulation)
(consultation) 14

Review of the Emissions Trading System and the Market Stability Reserve and development of the
Decarbonization Accelerator Act (draft) 15

Finland.....15

Act on the Safety of Consumer Products (in force) 15

Amendment to the Environmental Protection Act (in force) 16

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies,
and Standards
Issue 5 – 2025



France.....16

Procedures for authorization requests concerning chemical substances listed in Schedules 1 and 3 of the
Chemical Weapons Convention (published)..... 16

Ireland17

Carbon budgets for 2031-2035 and 2036-2040 (consultation)..... 17

United Kingdom.....17

Amendment to persistent organic pollutant Regulation (EU) 2019/1021 (in force)..... 17



NORTH AMERICA 18

United States.....18

Senate votes to overturn rule that limits seven hazardous air pollutants (published)..... 18

Upcoming regulatory and policy actions regarding per- and polyfluoroalkyl substances (published) 18



OCEANIA 19

Australia.....19

Three chemicals added to the Australian Industrial Chemicals Introduction Scheme inventory
(announcement) 19



SOUTH AMERICA..... 19

Brazil.....19

National Plan of Circular Economy 2025-2034 (approved) 19

Decree to implement Brazil REACH (consultation) 20

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 5 – 2025



GLOBAL

One hundred countries pledge to halve the health impacts of air pollution by 2040 (published)

On 7 May 2025, the World Health Organization (WHO) [announced](#) that over 100 countries pledged to halve the health impacts of air pollution by 2040, following the Second WHO Global Conference on Air Pollution and Health (March 25–27, 2025). This commitment involves new funding and stricter air quality standards aligned with WHO guidelines, targeting pollutants like PM2.5, which are linked to cardiovascular diseases, respiratory issues, and cancers.

For the aerospace and defense industry, particularly manufacturers with fuel-intensive operations or chemical processes, the pledge signals increased global regulatory pressure to reduce emissions. While no specific effective dates or penalties for non-compliance are detailed in the source, the pledge underscores a shift toward sustainable practices.

The Greenhouse Gas Protocol adds five new Observing Entities to its Independent Standards Board (published)

On 17 April 2025, the Greenhouse Gas (GHG) Protocol [announced](#) the addition of five new Observing Entities to its Independent Standards Board (ISB): CDP, European Financial Reporting Advisory Group, Global Reporting Initiative, International Sustainability Standards Board, and the Science Based Targets initiative. These organizations, which develop standards or frameworks referencing the GHG Protocol, will participate in ISB meetings in a non-voting capacity, focusing on standard development and revision. This move aims to enhance harmonization across the GHG accounting and reporting ecosystem, facilitating a more streamlined process for organizations setting and achieving climate targets.

This development underscores the increasing alignment of global sustainability standards. Engagement with these harmonized frameworks can aid in meeting regulatory requirements and stakeholder expectations related to greenhouse gas emissions reporting and reduction strategies.

Twelfth meetings of the Conference of the Parties to the Rotterdam and Stockholm Conventions (announced)

The twelfth meetings of the Conferences of the Parties to the [Rotterdam](#) and [Stockholm](#) Conventions (RC COP-12 and SC COP-12) took place in Geneva, Switzerland, from 28 April to 9 May 2025, alongside the seventeenth meeting of the Basel Convention. The joint theme was “Make visible the invisible: sound management of chemicals and wastes.”

The Rotterdam Convention establishes a Prior Informed Consent procedure for the international trade of hazardous industrial chemicals. At RC COP-12, Parties will consider listing the following substances in Annex III, which would require exporters to obtain consent from importing countries prior to trade:

- » acetochlor (CAS No. 34256-82-1)
- » carbosulfan (CAS No. 55285-14-8)
- » chlorpyrifos (CAS No. 2921-88-2)

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 5 – 2025



- » paraquat dichloride (liquid formulations) (CAS No. 1910-42-5)
- » iprodione (CAS No. 36734-19-7)
- » fenthion (CAS No. 55-38-9)
- » chrysotile asbestos (CAS No. 12001-29-5)
- » methyl bromide (CAS No. 74-83-9)
- » mercury (CAS No. 7439-97-6)

The Stockholm Convention aims to eliminate or restrict the production and use of persistent organic pollutants (POPs). At SC COP-12, Parties will consider listing the following substances in Annex A, which would obligate Parties to eliminate their production, use, import, and export unless specific exemptions are adopted:

- » chlorpyrifos (CAS No. 2921-88-2)
- » long-chain perfluorocarboxylic acids, their salts and related compounds (e.g., perfluorooctanoic acid [CAS No. 335-67-1])
- » chlorinated paraffins, specifically alkanes, C14-17, chloro (CAS No. 85535-85-9)

These proposals will be subject to discussion and potential adoption during the meetings. No new obligations are in effect at this stage.

Amendments to International Financial Reporting Standards Sustainability Disclosure Standard 2 (consultation)

In April of 2025, the International Sustainability Standards Board (ISSB) published an [Exposure Draft](#) proposing targeted amendments to International Financial Reporting Standards Sustainability Disclosure Standard 2 (i.e., IFRS S2), aiming to ease application challenges identified by stakeholders. Key proposals include allowing entities to exclude certain Scope 3 Category 15 greenhouse gas (GHG) emissions—specifically those associated with derivatives, facilitated emissions, and insurance-associated emissions—from disclosure requirements. Additionally, the amendments would permit the use of alternative global warming potential values mandated by local regulators instead of those from the latest Intergovernmental Panel on Climate Change assessment. The ISSB also proposes clarifying the use of jurisdictional relief when entities are required to use GHG measurement methods other than the Greenhouse Gas Protocol Corporate Standard. Furthermore, the amendments suggest introducing flexibility in industry classification systems, allowing entities to use alternatives to the Global Industry Classification Standard under certain conditions.

The exposure draft is open for public consultation until 27 June 2025. While no specific effective date has been set, the ISSB intends for the amendments to become effective as soon as possible, potentially by January 1, 2026, with early adoption permitted. Companies, particularly those with complex financial structures or operations across multiple jurisdictions, should monitor these developments closely. Although the ISSB does not prescribe penalties for non-compliance, enforcement mechanisms are determined by individual jurisdictions, which may impose their own sanctions for failure to adhere to the standards.



ASIA

China

Amendment to the Inventory of Existing Chemical Substances in China (amendment)

On 6 May 2025, the Ministry of Ecology and Environment (MEE) published an amendment to the Inventory of Existing Chemical Substances in China. MEE issued the amendment under the Measures for the Environmental Management Registration of New Chemical Substances (MEE Order No. 12), which regulates the introduction of new chemical substances into the Chinese market.

The amendment introduces three changes:

- » addition of new substances to the Inventory
- » incorporation of substances previously registered under the new substance registration system
- » revisions to the permitted use conditions for certain existing entries

These changes are detailed in annexes attached to the update. The amendment affects stakeholders involved in the manufacture, import, and use of chemical substances.

Penalties are not mentioned in the update. However, stakeholders are expected to comply with updated inventory listings and permitted use designations to avoid enforcement actions under broader chemical management regulations.

Additional information can be found in Chinese in this [announcement](#) from MEE.

English version of the mandatory national standard for the restriction of hazardous substances in electrical and electronic products (published)

On 1 April 2025, a technical review meeting was held in Beijing to assess the [English version](#) of the mandatory national standard for the restriction of hazardous substances (RoHS) in electrical and electronic products, developed under Project No. W20233603. The meeting was organized under the guidance of the Department of Energy Conservation and Comprehensive Utilization of the Ministry of Industry and Information Technology (MIIT) and coordinated by the China Electronics Standardization Institute. Nine experts representing research institutes, testing and certification bodies, industry associations, and major companies conducted a detailed review of the translation. The expert panel confirmed that the English version complies with GB/T 20000.10-2016 and GB/T 20000.11-2016 and unanimously approved it. The English version is expected to support scientific, technical, international exchange and cooperation in the management of hazardous substances in the electronics manufacturing industry and contribute to the broader recognition and application of green electrical and electronic products from China in international markets.

Penalties are not mentioned in the update.

Administration of import and export of ozone depleting substances (in force)

China's Ministry of Ecology and Environment (MEE) issued new measures for the administration of import and export of ozone depleting substances (ODS) to implement the Montreal Protocol and its amendments. The measures became effective on 1 May 2025. The regulation introduces a national framework for controlling the trade of ODS and aligns with international environmental obligations.

The measures apply to substances listed in the "List of Ozone-Depleting Substances Subject to Import and Export Control in China," which is periodically updated by the MEE, the Ministry of Commerce, and the General Administration of Customs. A quota-based licensing system is established for both import and export activities. Entities must apply for annual quotas and obtain separate import or export approval forms before engaging in trade.

Special provisions allow certain uses of ODS, such as for raw materials, laboratory analysis, quarantine, or recycled sources, to bypass quota requirements and directly apply for import or export approval forms. Licenses are issued on a per-shipment basis, valid for 90 days, and cannot be carried over into the next calendar year.

Importers and exporters are subject to strict documentation and reporting requirements. A national data platform will be used to manage ODS trade data, and authorities will share information on trade activity and non-compliance. Unused quotas must be reported and returned by 31 October each year to allow for redistribution.

Penalties are not specified in the regulation. The update grants supervisory authorities the right to conduct inspections and obliges entities to cooperate with requests for information.

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

India

Aluminum and Aluminum Alloy Products Quality Control Order (published)

On 5 May 2025, the Ministry of Commerce and Industry of India issued the [Aluminum and Aluminum Alloy Products Quality Control Order](#) (QCO), 2025, which supersedes the 2024 version. The new Order mandates that specified aluminum and aluminum alloy products must conform to the relevant Indian Standards and bear the Bureau of Indian Standards (BIS) Standard Mark under license from the BIS, in accordance with Scheme-I of Schedule-II of the BIS (Conformity Assessment) Regulations, 2018.

The Order applies to a wide range of aluminum products used in general engineering, irrigation, electrical, pharmaceutical, and aerospace applications. A detailed list of seventeen product categories and corresponding Indian Standards is provided in the annexed table. The implementation is phased, with different compliance dates for general enterprises, micro enterprises, and small enterprises.

Exemptions are provided for (i) goods manufactured domestically for export, and (ii) imports of up to 200 kilograms per year for research and development purposes by aluminum product manufacturers, subject to specific conditions on usage and record-keeping. BIS will serve as both the certification and enforcement authority.

QCOs are gazette orders issued pursuant to Section 16 of the BIS Act, 2016. They are issued by the Government to announce that relevant standards prescribed by the BIS concerning certain products will be mandatory effective from the date specified in the QCO. QCOs apply to products/articles (objects whose function is determined by their shape, surface or

design to a greater degree than their chemical composition). These orders require anyone handling the products/articles, including companies manufacturing or importing and downstream users, to comply with the requirements set out in the QCOs or face a ban. The requirements may be included from Indian Standards covered by the QCO - handling, packaging and marking requirements; and sampling methods and tests for substances contained in products/articles. By the issuance of QCOs, the use of Standard Mark under a License or a Certificate of Conformity from BIS is mandated.

Non-compliance with QCOs may result in penalties under the BIS Act, including fines of up to 5 lakh rupees.

More information can also be found in this [Alert](#) from IAEG.

Extension of implementation timeline for several Quality Control Orders (published)

On 5 May 2025, the Ministry of Heavy Industries of India [issued an order](#) extending the enforcement date for certain product categories listed in the Electrical Equipment (Quality Control) Second Amendment Order, 2024. The implementation timeline for product categories listed at serial numbers 1.2(a), 1.3(a), 2.1(a), 3.1(a), 4, 5, 6.1(a), 7, and 8.1 in the table of the said extension order is now extended by six months, from 10 May 2025 to 10 November 2025. This extension follows a series of prior modifications to the Electrical Equipment Quality Control Order (QCO) of 2020, including amendments and enforcement deferrals issued in 2021, 2022, and 2023. The Order mandates Bureau of Indian Standards (BIS) certification for specified electrical equipment categories in India to ensure quality and safety.

In addition, India [amended the effective dates](#) of three QCOs for H acid (CAS No. 5460-09-3), K acid (CAS No. 118-03-6), and vinyl sulphone (CAS No. 77-77-0). The Ministry of Chemicals and Fertilizers has postponed the date from which the original QCOs for the three substances come into effect. The original QCOs were published on 14 November 2024 and were issued by the Central Government in exercise of powers conferred by section 16 of the BIS Act, 2016. The new effective dates are:

- » 13 August 2025 for H acid
- » 13 May 2026 for K acid
- » 13 August 2025 for vinyl sulphone

This means that manufacturers, importers, retailers, and distributors dealing with these chemicals are granted an extension before the quality control requirements imposed by the original QCOs become mandatory.

Non-compliance with QCOs may result in penalties under the BIS Act, including fines of up to 5 lakh rupees.

Safety of Household, Commercial, and Similar Electrical Appliances (Quality Control) Order, 2025 (published)

The Safety of Household, Commercial, and Similar Electrical Appliances (Quality Control) Order, 2025 was published on 19 May 2025 and mandates compliance with Indian Standards (IS) for electrical appliances intended for household, commercial, or similar applications. The [regulation](#) requires all electrical appliances with a rated voltage not exceeding 250V for single-phase appliances and 480V for others, including battery-operated devices, to conform to IS 302 (Part 1): 2024. Manufacturers must obtain Bureau of Indian Standards (BIS) certification and affix the standard mark on their products. The Order includes a detailed table listing:

- » the types of electrical appliances covered
- » the applicable IS
- » the corresponding implementation dates for general, small, and micro enterprises

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 5 – 2025



The table also specifies exemptions for goods manufactured for export and limited quantities imported for research and development purposes (up to 200 imported items per year, provided they are not sold commercially). The Order will come into force on 19 March 2026. Manufacturers are allowed to sell or display uncertified stock manufactured or imported before the implementation date for up to six months, provided they declare this to the BIS.

Non-compliance with QCOs may result in penalties under the Bureau of Indian Standards Act, including fines of up to 5 lakh rupees.

Second revision to Indian Standard for ammonium nitrate (consultation)

The Bureau of Indian Standards published the [draft second revision to Indian Standard for ammonium nitrate](#) (CAS No. 6484-52-2) for explosives and opened a consultation on it (comments due on 8 June 2025). The standard prescribes requirements and the methods of sampling and testing for ammonium nitrate intended primarily for use in explosives. Small crystals of ammonium nitrate with a large surface-volume ratio facilitate the manufacture of amatol. The draft revision adds instrumental test methods for the determination of iron, lead, copper, zinc, manganese, chloride, and sulphate as alternate test methods.

Japan

Addition of seventy-eight substances to the workplace exposure limits list (published)

In April 2025, Japan's Ministry of Health, Labor, and Welfare (MHLW) published an update to the workplace exposure limits (WELs) list under the Industrial Safety and Health Act (ISHA). This update adds [seventy-eight substances](#) (can also be found [here](#) in Japanese) to the list, establishing short-term (15-minute) and long-term (eight-hour) exposure limits, also referred to as 'concentration standard values'.

The update provides tables of the substances with associated exposure limits expressed in ppm or mg/m³ and indicates where short-term exposure limits apply. Employers are required to perform mandatory risk assessments based on the specified WELs and implement appropriate monitoring and control measures. Manufacturers, importers and distributors must ensure compliance through accurate labeling and updated safety data sheets. The update aims to improve occupational health and safety in workplaces handling hazardous substances.

Penalties are not mentioned in the update.

Malaysia

Requirements for the export of chemicals to countries not parties to the Stockholm Convention (published)

On 23 April 2025, the Malaysian Department of Environment (DOE) announced [procedural requirements for the export of chemicals](#) to countries that are not Parties to the Stockholm Convention. According to Article 3 of the Convention, such exports from Malaysia are only permitted if the DOE issues an Annual Certification. This certification must specify the intended use of the chemical and confirm Malaysia's commitment to protecting human health and the environment in accordance with Convention provisions.

To initiate this process, the importing industry must submit supporting documentation to the DOE before making any importation request. Required documents include the Safety Data Sheet and detailed information on chemical use, safe handling, transport, environmentally sound disposal, monitoring systems, and measures to safeguard worker health and raise public awareness. After DOE review and approval, the importing industry must forward the certificate and supporting documents to the exporting Party. The exporting Party must then submit the certificate to its National Authority at least sixty days before beginning the export process. This procedure is currently manual and not integrated into the [MyEHS system](#). The update is relevant to companies in the chemicals sector.

Penalties are not mentioned in the update.

[Singapore](#)

Updates to Second Schedule of the Environmental Protection and Management Act 1999 regarding formaldehyde, dechlorane plus, and UV-328 (published)

Singapore's National Environment Agency (NEA) has published two amendments to the Second Schedule of the Environmental Protection and Management Act 1999. The Second Schedule lists hazardous substances regulated by the NEA, specifying chemicals requiring permits for import, sale, storage, or use, with certain exemptions outlined under specific conditions.

[Update 1](#) replaces the existing entry for formaldehyde (CAS No. 50-00-0) in Part I of the Second Schedule. The revised structure distinguishes between general uses and formaldehyde in paint, with the latter subject to specific conditions based on concentration and application. Part II inserts formaldehyde under items relating to paints, while a new Part IV introduces labeling requirements for paints containing formaldehyde for outdoor or industrial use. Labels must display a specific warning and meet minimum size requirements based on container volume.

[Update 2](#) revises entries for dechlorane plus (CAS No. 13560-89-9) and UV-328 (CAS No. 25973-55-1) in Part I, explicitly listing permitted uses across sectors including aerospace, defense, medical devices, adhesives, coatings, and plastics. Part II aligns with these changes by modifying product category restrictions to either exempt or specifically include these substances, clarifying their permissible use in items such as photographic paper, varnishes, and rubber materials.

Penalties are not mentioned in the updates. However, non-compliance can result in enforcement action under the Environmental Protection and Management Act 1999.

[South Korea](#)

Partial amendment to the Enforcement Rules of the Occupational Safety and Health Act (in force)

On 29 April 2025, the Ministry of Employment and Labor of South Korea promulgated a partial amendment to the Enforcement Rules of the Occupational Safety and Health Act. This amendment implements changes arising from the Presidential Decree No. 35483, which was also promulgated on the same date. Under the revised rules, employers are now required to submit documentation to the local employment and labor office within fourteen days when they dismiss safety managers or health managers, terminate service contracts with designated safety or health management agencies, or dismiss/relieve occupational health physicians.

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 5 – 2025



To support this new obligation, a standardized reporting form (Form No. 3-2) has been introduced. The reporting duty applies in accordance with Articles 11 and 23 of the Enforcement Rules, which were amended to reflect this requirement. Additional updates were made to existing reporting forms (Forms No. 2 and 3) to align legal citations and instructions with the new provisions. Penalties are not mentioned in the update.

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

Vietnam

Law to improve the management and safety of chemicals across their lifecycle (draft)

Vietnam's Draft Law on Chemicals introduces significant updates to improve the management and safety of chemicals across their lifecycle. The draft, released by the Ministry of Industry and Trade, proposes new regulations on chemical safety distances, expanded safety requirements for industrial projects, and clearer conditions for chemical consulting services. It also places greater emphasis on disclosure and control of hazardous substances in line with international standards like the Globally Harmonized System (GHS) for classification and labeling.

While the draft does not specify an official effective date or detailed enforcement measures, it is expected to be submitted to the National Assembly for review in an upcoming session. Companies involved in importing, manufacturing, or using regulated chemicals in Vietnam should prepare for potential changes to compliance obligations and operational procedures once the law is finalized. Penalties for non-compliance are not stated.

Additional information can be found [here](#) in Vietnamese.



EUROPE

European Union

Work plan to revise the European Sustainability Reporting Standards Set 1 (published)

On 25 April 2025, the European Financial Reporting Advisory Group (EFRAG) submitted a [work plan](#) to the European Commission, detailing its approach to revising and simplifying the European Sustainability Reporting Standards (ESRS) Set 1. This submission responds to a specific mandate received from the Commission on 27 March 2025. The work plan outlines key activities, deliverables, and stakeholder engagement strategies that EFRAG will undertake to meet the target deadline of 31 October 2025. Notably, it includes a public consultation on the Exposure Drafts, scheduled to occur between the end of July and early September 2025. EFRAG emphasizes its commitment to reducing the reporting burden for companies while ensuring that the ESRS remain practical, effective, and proportionate, supporting the quality and robustness of sustainability disclosures. Earlier in April, EFRAG had initiated a [public consultation](#) to gather feedback on proposed revisions to ESRS Set 1 (comments were due on 6 May 2025).

At this stage, the work plan itself does not establish legal obligations, effective dates, or penalties, but ongoing evolution of Corporate Sustainability Reporting Directive (CSRD) can be found in this [additional information](#). IAEG member companies that are subject to CSRD should monitor this process to stay informed of potential reporting changes.

Work plan to enhance circular and efficient products (published)

On 25 April 2025, the European Commission adopted the 2025–2030 [working plan](#) for the Eco-design for Sustainable Products Regulation (ESPR) and Energy Labeling Regulation. This initiative aims to enhance the circularity and energy efficiency of products, aligning with the European Union (EU) Green Deal objectives. The plan outlines key product groups targeted for eco-design requirements, including steel, aluminum, tires, and certain electronics. By setting performance and information requirements, the ESPR seeks to reduce environmental impacts throughout product life cycles. While the working plan sets strategic direction, specific dates and penalties for non-compliance are not currently established. Companies, particularly those involved in manufacturing and supplying components within the EU, may be affected by this 2025–2030 working plan. The ESPR may not apply to products designed exclusively for defense or national security purposes. The exemption covers military-specific equipment tied to security rather than commercial or civilian use.

Adjustment to dates to apply certain corporate sustainability reporting and due diligence requirements (published)

On 14 April 2025, the European Union (EU) adopted [Directive \(EU\) 2025/794](#), amending Directives (EU) 2022/2464 and (EU) 2024/1760 to adjust the dates from which Member States are to apply certain corporate sustainability reporting and due diligence requirements. The directive entered into force on 17 April 2025, and Member States are required to transpose its provisions into national law by 13 December 2025. The amendments aim to streamline implementation timelines while maintaining the objectives of the EU Green Deal and the Sustainable Finance Action Plan.

For companies operating within the EU, this directive may influence the scheduling of compliance efforts related to sustainability reporting and due diligence obligations. While the directive does not introduce new penalties, companies should monitor national transpositions to ensure timely adherence to adjusted requirements.

Technical specifications for the digital platform to report obligations under microplastics restrictions (published)

The European Chemicals Agency (ECHA) has published the [“Microplastics Reporting System Requirements”](#) document, outlining the technical specifications for the forthcoming digital platform that will enable companies to fulfill their reporting obligations under the European Union’s microplastics restriction. This restriction, adopted in September 2023, mandates that companies report annually on the use of intentionally added microplastics in products. The reporting system is designed to collect data on the quantities, uses, and release pathways of microplastics, facilitating compliance monitoring and environmental protection efforts.

For companies, this reporting requirement is pertinent if their products contain intentionally added microplastics, such as in certain coatings, sealants, or composite materials. Compliance will involve accurately tracking and reporting relevant data through ECHA’s digital platform.

Regulatory Technical Standards to enhance transparency and integrity of environmental, social, and governance rating activities (consultation)

On 2 May 2025, the European Securities and Markets Authority (ESMA) launched a [consultation](#) on draft Regulatory Technical Standards (RTS) under the European Union (EU) environmental, social, and governance (ESG) Rating Regulation, aimed at enhancing transparency and integrity in ESG rating activities (comments due on 20 June 2025). The proposed standards cover authorization requirements, conflict of interest safeguards, and public disclosure obligations for ESG rating providers. ESMA is planning for a final report and draft RTS submission to the European Commission in October 2025.

The regulation is expected to begin in early 2026, with an eighteen-month implementation period post-entry into force, meaning full compliance will likely be required by mid-2027. Non-compliance penalties are not specified in the source.

Restrictions on thirteen chromium VI substances (consultation)

The European Chemicals Agency (ECHA) published the [Annex XV Restriction Report](#) for thirteen chromium VI substances [Cr(VI)], which are currently subject to authorization requirements under the European Union (EU) REACH. ECHA has concluded that an EU-wide restriction is justified as Cr (VI) substances are among the most potent workplace carcinogens and pose a serious risk to workers' health. People living near industrial sites that release these substances into the environment are also at risk of lung and intestinal cancers. A consultation on this proposal is planned to start on 18 June 2025.

ECHA has developed two restriction options, the only differences are the limits for the workplace exemption. The use of the Cr (VI) substances on their own or in a mixture will be banned at a concentration equal or greater than 0.01 % by weight. Exemptions apply to their use as intermediates and to workplaces under specific conditions. Details can be found in Table 37 and 38 of the report.

Delegated Regulation amending Annex I of Regulation (EU) 2023/1115 (EU Deforestation Regulation) (consultation)

The European Commission (EC) has proposed a [Delegated Regulation](#) to amend Annex I of Regulation (EU) 2023/1115, the European Union (EU) Deforestation Regulation (EUDR). The amendment introduces targeted technical clarifications, including the addition of the "ex" prefix to specific Combined Nomenclature (CN) codes to indicate that only certain subcategories of broader product groups—particularly under palm oil, rubber, and wood—fall within the EUDR's scope. These changes aim to reduce ambiguity, ensure legal certainty for operators and authorities, and avoid unnecessary compliance burdens.

The draft also explicitly excludes from the regulation's scope waste, second-hand products, test samples, certain packing materials, accessory items like manuals, and items of correspondence, unless they are placed independently on the market. By refining product classifications, the EC intends to safeguard circular economy practices and reduce administrative overhead. The regulation is scheduled to take effect the day after its publication in the Official Journal of the European Union, following stakeholder consultation and a four-week public feedback period.

Review of the Emissions Trading System and the Market Stability Reserve and development of the Decarbonization Accelerator Act (draft)

The European Commission (EC) is conducting a [review](#) of the European Union (EU) Emission Trading System (ETS) and Market Stability Reserve (MSR) to ensure these mechanisms remain effective and economically efficient in delivering emissions reductions aligned with the EU's 2030 (62% reduction vs. 2005) and 2050 climate goals. The review includes aviation, maritime transport, and stationary installations and supports the development of a 2040 emissions target under the European Climate Law and "Fit for 55" package. Key issues under consideration include carbon leakage protection, integration of carbon removals, municipal waste incineration, emissions thresholds, and international carbon market links. Penalties for non-compliance with ETS rules, such as failing to surrender allowances, remain in force. A legislative proposal is expected in Q3 2026, informed by a back-to-back evaluation and impact assessment and an open public consultation.

Further, as part of the Clean Industrial Deal, the EC is developing the Industrial Decarbonization Accelerator Act to fast-track emissions reductions in energy-intensive industries (EIs) such as steel, cement, chemicals, and refineries. These sectors face high energy costs, complex permitting, and slow technology deployment—challenges that the Act aims to address by simplifying regulatory processes, supporting priority decarbonization projects, and fostering lead markets for low-carbon products. The [upcoming regulation](#) will evaluate legislative and non-legislative options to enhance energy access, improve permitting timelines, and promote clean feedstock adoption through tools like sustainability-based procurement and carbon labeling. While no penalties are currently defined, changes are expected by Q4 2025. Stakeholders across Member States and industry are encouraged to engage in the open twelve-week consultation process to shape implementation.

[Finland](#)

Act on the Safety of Consumer Products (in force)

On 29 April 2025, Finland published the Act on the Safety of Consumer Products (184/2025; the Act), which aligns national legislation with Regulation (EU) 2023/988 on general product safety. This new law replaces the previous Consumer Safety Act (920/2011) and applies to all consumer products falling within the scope of the European Union (EU) regulation. It establishes the Safety and Chemicals Agency (Tukes) and Customs as market surveillance authorities and details their inspection and enforcement powers, including authority over online marketplaces.

The Act mandates the use of Finnish or Swedish in consumer information and instructions, introduces administrative penalties for non-compliance, and sets requirements for economic operators including manufacturers, importers, distributors, authorized representatives, and digital platforms. The Act includes specific provisions for machinery primarily used by consumers, facilitates notification procedures to the European Commission, and establishes a Consumer Safety Advisory Board under the Ministry of Economic Affairs and Employment.

Non-compliance may result in administrative penalties of up to 1% of annual turnover or income, capped at €100,000 for legal entities and €10,000 for individuals based on the severity and duration of the violation. Criminal penalties for serious violations are also possible.

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

Amendment to the Environmental Protection Act (in force)

The Act Amending the Environmental Protection Act (144/2025) updates the Environmental Protection Act (527/2014), which is Finland's central environmental legislation, governing pollution prevention, permitting, and emissions control for industrial and waste-related activities. The amendment aligns Finnish legislation with Directive (EU) 2024/1785 and introduces regulatory updates related to waste management, biogas plant operations, and marine environmental protection. It includes revised permitting exemptions for the use of certain treated wastes, clarification of emissions thresholds for thermal treatment installations, and a notification system for small-scale biogas plants.

The Act also updates annexes that define permit and notification thresholds. Annex 1 expands the list of directive-based activities to include inorganic chemical manufacturing and hydrogen production via water electrolysis above 50 tonnes per day. Annex 4 introduces notification conditions for certain biogas plants located at livestock facilities and processing specific agricultural materials.

The amendment prohibits the dumping of waste and other materials into Finnish territorial waters or the exclusive economic zone as of 1 May 2028. Operators of affected installations may be subject to stricter environmental requirements, particularly regarding emissions and reporting. Treated ash and sludge used in line with the Fertilizer Product Act are exempt from permitting obligations.

The Act came into force on 1 May 2025, with certain provisions entering into force on 1 January 2026 and 1 May 2028. Penalties are not mentioned in the update.

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

France

Procedures for authorization requests concerning chemical substances listed in Schedules 1 and 3 of the Chemical Weapons Convention (published)

On 17 May 2025, France published a new order (the Order) establishing procedures for authorization requests concerning chemical substances listed in Schedules 1 and 3 of the Chemical Weapons Convention (CWC). The Order entered into force on 1 June 2025 and applies to activities including the development, manufacture, acquisition, use, storage, trade, and brokerage of these substances.

The CWC is an international treaty prohibiting the development, production, stockpiling, transfer, and use of chemical weapons. It aims to ensure the elimination of chemical weapons while promoting transparency and safety in legitimate chemical activities. The Order implements France's obligations under the CWC and aligns national procedures with the Defense Code. The Ministry of Industry is the responsible authority for overseeing compliance.

The Order outlines requirements for comprehensive authorization dossiers. These include identity verification, detailed site and equipment descriptions, chemical specifications (e.g. CAS number, formula, concentration), and traceability and security measures. Requirements differ depending on whether the applicant is an individual, a commercial operator, or a non-commercial organization. The regulation also details procedures for renewing or modifying existing authorizations. While the Order does not contain annexes, it references Schedules 1 and 3 of the Stockholm Convention and points to online resources for templates and submission guidance.

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 5 – 2025



Penalties for non-compliance include suspension, modification, or withdrawal of authorizations.

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

Ireland

Carbon budgets for 2031-2035 and 2036-2040 (consultation)

The Department of the Environment, Climate, and Communications launched a [public consultation](#) on the Climate Change Advisory Council's proposed carbon budgets for 2031–2035 (160 MtCO₂eq) and 2036–2040 (120 MtCO₂eq). Comments were due on 4 June 2025. These budgets are part of Ireland's legally mandated pathway to a 51% emissions reduction by 2030 (vs. 2018) and net-zero by 2050, as required under the Climate Action and Low Carbon Development (Amendment) Act 2021. While the consultation does not specify penalties, carbon budgets are legally binding, and non-compliance could lead to enforcement measures under the Act.

United Kingdom

Amendment to persistent organic pollutant Regulation (EU) 2019/1021 (in force)

The United Kingdom (UK) has amended its Persistent Organic Pollutant (POPs) Regulation (EU) 2019/1021 that applies in Great Britain and regulates the use, manufacture and placing on the market of POPs by implementing the Stockholm Convention. Part A of Annex 1 to the regulation lists the substances restricted under the Stockholm Convention and the restrictions and conditions that apply to them.

In March 2025, this regulation was [amended](#) via Statutory Instrument (SI) 2025 No. 296 and 2025 No. 297 to add dechlorane plus (CAS Nos. 13560-89-9; 135821-03-3; 135821-74-8), methoxychlor (CAS Nos. 72-43-5; 30667-99-3; 76733-77-2; 255065-25-9; 255065-26-0; 59424-81-6; 1348358-72-4; and others) and UV-328 (CAS no. 25973-55-1) to Part A to Annex 1, after their inclusion in the Stockholm Convention.

The new [SI 2025 No. 605](#) amends the UK POP regulation to revoke the addition of dechlorane plus and UV-328 to Part A to Annex 1. This is due to industry stakeholders indicating a continuing need for the use of these substances in certain medical applications. To avoid any shortages in the health care system, the UK has opted to revoke the restrictions on these substances and re-implement them in the future after further assessments of the situation have been carried out. SI 2025 No. 605 does not make changes to the status of methoxychlor; it is still restricted under the UK POP regulation.

This amendment entered into force on 21 May 2025. No penalties are applicable.

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 5 – 2025



NORTH AMERICA

United States

Senate votes to overturn rule that limits seven hazardous air pollutants (published)

On 4 May 2025, the U.S. Senate voted to overturn an Environmental Protection Agency (EPA) rule under the Clean Air Act. The rule has mandated that industrial facilities, including those in the aerospace and defense sector, classified as "major" sources of seven hazardous air pollutants (e.g., dioxins, mercury, PCBs) maintain strict pollution controls indefinitely, per the "Once in, Always In" policy.

This Congressional Review Act resolution, now pending House approval and expected presidential assent, marks the first weakening of Clean Air Act protections in its 55-year history. For companies operating chemical or refining processes, this could ease compliance burdens but may risk public health backlash, as critics warn of increased toxic emissions linked to cancer and other serious conditions. The resolution awaits further legislative action in the House before any potential shifts in the regulatory are finalized.

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

Upcoming regulatory and policy actions regarding per- and polyfluoroalkyl substances (published)

On 28 April 2025, the U.S. Environmental Protection Agency (EPA) announced a [coordinated set of upcoming regulatory and policy actions](#) to address per- and polyfluoroalkyl substances (PFAS). The announcement includes the designation of an agency-wide PFAS lead, new testing strategies under Section 4 of the Toxic Substances Control Act (TSCA), updates to PFAS destruction and disposal guidance, and the development of effluent limitations guidelines (ELGs) targeting PFAS manufacturers and metal finishers.

EPA also intends to enhance enforcement under the Clean Water Act, TSCA, and the Safe Drinking Water Act, expand the Toxic Release Inventory (TRI) listing for PFAS, and evaluate use of RCRA authorities. Further actions will include prioritizing risk-based reviews of PFAS, streamlining information collection under TSCA section 8(a)(7), and developing a liability framework based on the polluter pays principle to shield passive receivers such as local utilities.

EPA is also working on state partnerships for cleanup, remediation, and enforcement, as well as providing risk assessment tools and evaluating air-related PFAS emissions. These developments may affect sectors dealing with PFAS production, use, or emissions, including aerospace, electronics, and surface finishing industries.

Penalties are not mentioned in the update.

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies,
and Standards
Issue 5 – 2025



OCEANIA

[Australia](#)

Three chemicals added to the Australian Industrial Chemicals Introduction Scheme inventory (announcement)

In April 2025, the Australian Industrial Chemicals Introduction Scheme (AICIS) [announced the addition of three substances](#) to the AICIS Inventory. One substance – carbamic acid, N,N'-1,6-hexanediylbis-, C,C'-bis[2-[2-(1-ethylpentyl)-3-oxazolidinyl]ethyl] ester (CAS No. 140921-24-0) – was listed on 11 April 2025 following the issuance of an assessment certificate. Its approved use includes reformulation into coatings, adhesives, and sealants for professional use at concentrations up to 20%.

Two additional substances were added to the Inventory under the standard five-year post-assessment rule:

- » D-glucofuranose, oligomeric, 2-ethylhexyl glycosides (CAS No. 161074-93-7) – listed on 17 April 2025
- » tetradecene, homopolymer, hydrogenated (CAS No. 1857296-89-9) – listed on 28 April 2025

For these substances, AICIS requires that introducers notify the authority within 28 days if their importation or manufacturing circumstances differ from those in the original assessment.

Penalties are not mentioned in the update.



SOUTH AMERICA

[Brazil](#)

National Plan of Circular Economy 2025-2034 (approved)

On 8 May 2025, the Brazilian Ministry of Development, Industry, Commerce and Services (MDIC) approved the [National Circular Economy Plan](#) (PLANEC) at the second meeting of the National Circular Economy Forum, following a public consultation process that ran from 18 February 2025 to 19 March 2025. The plan is intended to guide policies for the period 2025-2034, outlining goals and actions for implementing circularity in the Brazilian economy. The plan serves as the implementation mechanism for the National Circular Economy Strategy (ENEC). The primary purpose is to facilitate Brazil's transition from a linear "extract, produce, consume, discard" economic model to a circular one, aiming to promote efficient resource use, sustainable practices, and social justice. Implementing this strategy requires not only changing industrial processes but also adopting a new mindset by companies and consumers. Government action is considered vital to encourage, scale, and accelerate this change.

PLANEC contains eighteen objectives, and more than seventy actions, aimed at transitioning Brazil's economy towards a circular model between 2025 and 2034. These initiatives introduce new requirements and opportunities for manufacturers, importers, retailers, distributors, and workers. Key aspects include the establishment of quantifiable goals, standards, and indicators for circularity, coupled with efforts to develop markets for reusable, refurbished, and recycled products, which involve encouraging the use of secondary materials and simplifying rules for their circulation. The plan promotes innovation, research, and development in circular technologies and design, alongside fostering training programs to build necessary skills within companies and the workforce. A significant focus is placed on reducing resource use and waste generation, encouraging circular design from the product's inception, expanding reverse logistics systems, supporting refurbished, remanufactured, and reusable industries, and integrating waste management policies with circular economy principles, including combating planned obsolescence and encouraging product repairability. Furthermore, PLANEC proposes various financial instruments, such as specific credit lines and incentives through public procurement and tax adjustments, to support circular initiatives. Finally, it prioritizes the inclusion and professionalization of workers in circular value chains, particularly informal waste collectors, by supporting training and strengthening recycling cooperatives.

PLANEC is structured around five main annexes (or axes), which cover different aspects of implementing the circular economy:

- » Annex 1 focuses on creating a favorable regulatory and institutional environment
- » Annex 2 promotes innovation, culture, education, and skills generation
- » Annex 3 aims to reduce resource use and waste generation
- » Annex 4 proposes financial instruments
- » Annex 5 promotes inter-federative coordination and the involvement of workers

For each Annex, the plan details goals, initiatives, and key stakeholders (those primarily responsible). There are no penalties associated with this update.

More information can be found in Portuguese in this [article](#) and the [PLANEC document](#).

Decree to implement Brazil REACH (consultation)

Brazil has opened a consultation on the draft decree to implement LAW No. 15,022 of 13 November 2024, also known as Brazil REACH, which establishes the National Inventory of Chemical Substances, and the assessment and risk control of chemical substances used, produced or imported in the national territory. This draft regulation specifies the information that must be submitted to the Inventory, the responsibilities of the different agencies and committees, the requirements for animal testing, the fees to be paid, and others.

Whereas a consultation was opened until 13 June 2025, a note on the consultation website mentions that the consultation has been temporarily suspended. Once it reopens, the deadline will be extended by 60 days.

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

NEWSLETTER

*Global Chemical, Environmental, Social, and Governance Regulations, Policies,
and Standards
Issue 5 – 2025*



DISCLAIMER

THIS DOCUMENT IS PROVIDED BY INTERNATIONAL AEROSPACE ENVIRONMENTAL GROUP, INC. (“IAEG”) FOR INFORMATIONAL PURPOSES ONLY. ANY INACCURACY OR OMISSION IS NOT THE RESPONSIBILITY OF IAEG. DETERMINATION OF WHETHER AND/OR HOW TO USE ALL OR ANY PORTION OF THIS DOCUMENT IS TO BE MADE IN YOUR SOLE AND ABSOLUTE DISCRETION. PRIOR TO USING THIS DOCUMENT OR ITS CONTENTS, YOU SHOULD REVIEW IT WITH YOUR OWN LEGAL COUNSEL. NO PART OF THIS DOCUMENT CONSTITUTES LEGAL ADVICE. USE OF THIS DOCUMENT IS VOLUNTARY. IAEG DOES NOT MAKE ANY REPRESENTATIONS OR WARRANTIES WITH RESPECT TO THIS DOCUMENT OR ITS CONTENTS. IAEG HEREBY DISCLAIMS ALL WARRANTIES OF ANY NATURE, EXPRESS, IMPLIED OR OTHERWISE, OR ARISING FROM TRADE OR CUSTOM, INCLUDING, WITHOUT LIMITATION, ANY IMPLIED WARRANTIES OF MERCHANTABILITY, NONINFRINGEMENT, QUALITY, TITLE, FITNESS FOR A PARTICULAR PURPOSE, COMPLETENESS OR ACCURACY. TO THE FULLEST EXTENT PERMITTED BY APPLICABLE LAWS, IAEG SHALL NOT BE LIABLE FOR ANY LOSSES, EXPENSES OR DAMAGES OF ANY NATURE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL, PUNITIVE, DIRECT, INDIRECT OR CONSEQUENTIAL DAMAGES OR LOST INCOME OR PROFITS, RESULTING FROM OR ARISING OUT OF A COMPANY’S OR INDIVIDUAL’S USE OF THIS DOCUMENT, WHETHER ARISING IN TORT, CONTRACT, STATUTE, OR OTHERWISE, EVEN IF ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.