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 6 – 2025

WHO IS IAEG?

The International Aerospace Environmental Group (IAEG) is a non-profit organization of global aerospace companies created to collaborate on and share innovative environmental solutions for the industry. The group works to promote the development of voluntary consensus standards and provide accessible solutions for key environmental issues.

Members of IAEG recognize that there are currently a wide variety of different laws and regulations impacting health and the environment in place worldwide. The complexity and variability of requirements and guidance has led to an increased burden for the industry and its supply chain.

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

IAEG WORK GROUP 9 NEWSLETTER

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

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

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

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GLOBAL

Decisions adopted by the Conference of the Parties to the Rotterdam and Stockholm Conventions at their twelfth meetings (adopted)

The twelfth meetings of the Conferences of the Parties (COP) 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. The report on the decisions adopted at these meetings has now been published.

The Rotterdam Convention (RC) establishes a Prior Informed Consent (PIC) procedure for the international trade of hazardous chemicals and pesticides, promoting shared responsibility and cooperation among Parties to the RC. Chemicals listed in Annex III of the RC include pesticides and industrial chemicals that have been banned or severely restricted for health or environmental reasons by two or more Parties and are subject to the PIC procedure.

The COP adopted two decisions listing carbosulfan (CAS No. 55285-14-8) – decision RC-12/3 – and fenthion (ultra-low-volume formulations at or above 640 grams active ingredient/liter) (CAS No. 55-38-9) – decision RC-12/4 – under Annex III to the RC. The entry into force of these amendments for all Parties is 22 October 2025.

The Stockholm Convention aims to protect human health and the environment from persistent organic pollutants (POPs) by restricting or eliminating their production, use, and release. The SC's substance list is divided in three annexes:

- Annex A: measures must be taken to eliminate the production and use of these chemicals
- Annex B: measures must be taken to restrict the production and use of these chemicals
- Annex C: measures must be taken to reduce the unintentional releases of these chemicals

Exemptions are usually set up for the above restrictions and each Party can decide which exemptions, if any, will apply in their territory.

The COP adopted the following decisions:

- to list Chlorpyrifos (CAS No. 2921-88-2) – decision SC-12/9 – under Annex A; banning its production and use subject to specific agricultural exemptions
- to list medium-chain chlorinated paraffins (MCCPs) – decision SC-12/10 – under Annex A; banning its production and use subject to specific exemptions
- to list long-chain perfluorocarboxylic acids, their salts, and related compounds – decision SC-12/12 – under Annex A; banning its production and use subject to specific exemptions
- to amend entry for UV-328 (CAS No. 25973-55-1) – decision SC-12/14 – to add a new exemption for "water-seal tape for insulation blankets and decking on aircraft; and polyurethane and polyamide adhesives, and polyurethane coatings, for structural, mechanical, interior and electrical assemblies, and emergency, propulsion, environmental control, and flight control systems, on aircraft."

The entry into force of these decisions will depend on their ratification as according to Article 21 of the convention: "Ratification, acceptance or approval of an amendment shall be notified to the Depositary in writing. An amendment adopted in accordance with paragraph 3 shall enter into force for the Parties having accepted it on the ninetieth day after the date of deposit of instruments of ratification, acceptance, or approval by at least three fourths of the Parties.

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Thereafter, the amendment shall enter into force for any other Party on the ninetieth day after the date on which that Party deposits its instrument of ratification, acceptance, or approval of the amendment."

In addition to these decisions, other aspects, such as implementation management, cooperation between the conventions, etc., were discussed in the two meetings. There are no penalties associated with these updates.

Release of Global Reporting Initiative Digital Sustainability Taxonomy (announced)

The Global Reporting Initiative (GRI) Sustainability Taxonomy, officially released on June 19, 2025, introduces a structured digital framework for sustainability reporting aligned with the GRI Standards. It uses XBRL (i.e., eXtensible Business Reporting Language) to enable efficient and reliable machine-readable disclosures, offering both automated and manual submission options. Key features include full coverage of the Universal, Topic, and Sector Standards of GRI, real time validation to ensure data quality, and multiple export formats (such as XBRL/burl, Excel, and PDF).

The taxonomy was developed with input from public consultations throughout 2024, engaging sustainability and XBRL specialists to ensure technical robustness and practical usability (globalreporting.org). Non-compliance penalties are not applicable, as GRI Standards and the taxonomy are voluntary frameworks, not regulatory mandates.

ASIA

China

Two mandatory national standards targeting the control of harmful substances in coatings (published)

On 30 May 2025, China's State Administration for Market Regulation, through the Standardization Administration of China, approved two mandatory national standards targeting the control of harmful substances in coatings. These standards, GB 30981.1-2025 for architectural coatings and GB 30981.2-2025 for industrial coatings, are set to take effect on 1 June 2026:

- GB 30981.1-2025 will replace GB 18582-2020 and GB 38468-2019
- GB 30981.2-2025 will replace GB 18581-2020, GB 24409-2020, GB 24613-2009, GB 30981-2020, GB 38469-2019

The update follows a thorough public consultation process spanning 2024 and 2025. There are no penalties associated with this update at this time.

Additional information can be found in Chinese in this announcement and in these published limits of hazardous coatings Part 1 for architectural coatings and Part 2 for industrial coatings.

Updates to the Inventory of Existing Chemical Substances in China (published)

On 6 May 2025, China's Ministry of Ecology and Environment (MEE) published an announcement (No. 9 of 2025) regarding updates to the Inventory of Existing Chemical Substances in China (IECSC). The IECSC is China's official inventory listing

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chemical substances that can generally be manufactured or imported without prior registration, unless subject to other controls. Substances not listed are considered new and require registration under "Measures for the Environmental Management Registration of New Chemical Substance" (MEE Order No. 12). The update includes three lists:

- the 13th batch of newly supplemented existing chemical substances (first batch of 2025)
- the 15th batch of previously registered new substances now added to the IECSC (first batch of 2025)
- the first batch of changes in permitted uses for listed substances (first batch of 2025)

These changes were issued in accordance with MEE Order No. 12 and supporting documentation. Penalties are not mentioned in the update.

More information can be found in Chinese in this announcement.

Release of "XML-based Chemical Safety Data Sheet Data Specification" (consultation)

China's National Standard Information Public Service Platform has released a draft national standard titled "XML-based Chemical Safety Data Sheet Data Specification" for public consultation. The proposal seeks to replace traditional paper-based safety data sheets (SDSs) with a structured, XML-based digital format to improve consistency, lower compliance burdens, and address interoperability challenges in cross-border trade. The standard is being developed under the leadership of TC251 and the National Standards Committee, with the Chemical Registration Center of the Ministry of Emergency Management and the China Petroleum and Chemical Industry Federation as the main drafting bodies. The project (Plan No. 20243488-T-469) has a preparation cycle of eighteen months. Interested parties can comment on the consultation until the deadline on 29 July 2025 before the standard is sent for review.

More information can be found here in Chinese.

Collecting information about UV-328 (draft)

China is moving forward with the implementation of a recent amendment to the Stockholm Convention on Persistent Organic Pollutants (POPs), which includes ultraviolet absorber UV-328 (CAS No. 25973-55-1) in Annex A (elimination), with limited exemptions. The Stockholm Convention, which took effect in China in 2004, aims to reduce the risks posed by POPs, which are chemicals known for their persistence in the environment, ability to bioaccumulate, and harmful effects on human and ecological health. The inclusion of UV-328 reflects growing global concern over its environmental and health risks.

Under the updated regulation, UV-328 has been added to Annex A, meaning it is subject to elimination. However, specific exemptions have been approved for its use in waterproof sealing tapes, polyurethane and polyamide adhesives, and polyurethane coatings used in aircraft. These exemptions are valid until the end of 2030. This change was adopted at the twelfth meeting of the Conference of the Parties in May 2025 and brings the total number of substances listed under the Convention to thirty-seven.

To prepare for this amendment, the Ministry of Ecology and Environment (MEE) collected updated information on UV-328, including details on its production, use, import, export, and available substitutes in China. This will help assess whether the country should apply for the listed exemptions. Companies involved with UV-328 are encouraged to evaluate its use within their operations and prepare to either substitute it or justify continued use under the exemption criteria.

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The amendment will come into effect following China's formal approval and implementation process. While specific penalties for non-compliance are not outlined in this update, failure to comply may result in enforcement under China's existing POPs control framework.

More information can be found in Chinese in this notice from MEE.

India

Amendment to the Plastic Waste Management Rules, 2016 (draft)

A draft amendment to the Plastic Waste Management Rules, 2016, which provide a statutory framework for plastic waste management, has been published. The draft amendment aims to simplify the requirements to further strengthen the effective implementation of guidelines on Extended Producer Responsibility on Plastic packaging. The draft amendment proposes new mandatory obligations for Producers, Importers, and Brand Owners regarding the use of recycled plastic content and the reuse of rigid plastic packaging.

Producers, Importers, and Brand Owners must ensure the use of recycled plastic in their plastic packaging according to category-wise percentages starting from the year 2025-26. The percentages mandated for 2025-26 are 30% for Category I, 10% for Category II, and 5% for Category III, with these percentages increasing annually in subsequent years.

For importers, any recycled plastic content already present in the imported material will not count towards their obligation. Importers must fulfil their quantitative obligation for recycled content by purchasing certificates of an equivalent quantity from other Producers, Importers, and Brand Owners who have exceeded their recycled content obligation. A mechanism for this exchange on the centralized online portal will be developed by the Central Pollution Control Board.

Brand Owners using Category I (rigid) plastic packaging for their products must meet a minimum reuse obligation. The required percentages vary based on the packaging size and the product type. The quantity of rigid packaging reused is calculated by reducing virgin plastic packaging manufactured/imported/purchased from the brand owner's sales in that year. Reuse of rigid plastic packaging in food contact applications is subject to regulation by the Food Safety and Standards Authority of India. Additionally, Brand Owners must provide information regarding their reuse and recycled content obligations on the centralized portal developed by the Central Pollution Control Board.

Producers, Importers, and Brand Owners may be allowed to carry forward any shortfall in meeting the mandatory recycled plastic use obligation for the year 2025-26 for a period of three years starting from 2026-27, in addition to the targets mandated for those years. Brand owners may also carry forward shortfalls in their minimum reuse obligation for Category I rigid packaging for the year 2025-26 for three years starting from 2026-27.

Exemptions from meeting the recycled plastic content or reuse obligations may be granted by the Central Pollution Control Board on a case-by-case basis in instances where meeting the obligation is not possible due to statutory or technical requirements.

Interested persons can submit comments on this draft until 3 August 2025. The proposed rules are expected to come into force on the date of their publication in the Official Gazette.

Japan

Amendments to the list of substances subject to safety data sheets and globally harmonized system labeling (published)

On 30 May 2025, the Japanese Ministry of Health, Labor, and Welfare published amendments to the list of substances subject to safety data sheet (SDS) and globally harmonized system based labeling obligations under the Industrial Safety and Health Act. The update introduces revised cut-off values and new CAS identifiers for four substances subject to labeling and SDS provision. Key changes include:

- establishment of a 1% cut-off value for rel-(1R,2R)-2-tert-butylcyclohexyl acetate (CAS No. 20298-69-5)
- revision of the cut-off value to 0.3% for N-(2-aminoethyl)-2-aminoethanol (CAS No. 111-41-1)
- inclusion of CAS numbers for:
  - divinylbenzene (CAS No. 1321-74-0)
  - trimethylbenzene (CAS No. 25551-13-7, mixed isomers)

The revised obligations will apply from 1 April 2027.

More information can be found here in Japanese.

Globally harmonized substances classification results updated for four substances (published)

On 29 May 2025, the National Institute of Technology and Evaluation (NITE) globally harmonized substances (GHS) classification results were updated for four substances. The NITE in Japan provides GHS classification results, with the classification process following the guidelines set by the GHS. NITE uses a combination of data from literature, databases, and experimental results to classify chemicals. The database offers a crucial reference for creating GHS labels and Safety Data Sheets (SDS). While these classifications are provided by the Japanese Government, users are not legally obliged to incorporate them into their own labels or SDS; rather, they can cite or copy the results but retain responsibility for their final documents. The classification process is based on specific guidance and information sources, and users are permitted to utilize alternative literature or test results to justify different classifications.

The amendment includes new substance classifications and classification revisions related to the following substances:
Revised classifications:

- ethanethiol; ethyl mercaptan (CAS No. 75-08-1)
- phosphorus pentoxide (CAS No.1314-56-3)

New classifications:

- trans-Cyclohexane-1,2-dicarboxylic anhydride; trans-hexahydrophthalic anhydride (CAS No. 14166-21-3)
- (1RS,2SR,5RS;1RS,2SR,5SR)-2-(4-chlorobenzyl)-5-isopropyl-1-(1H-1,2,4-triazol-1-ylmethyl)cyclopentanol; Ipconazole (CAS No. 125225-28-7)

There are no penalties associated with this update.

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Request for collection of hazardous information concerning general chemical substances and priority assessment chemicals substances (consultation)

On 12 June 2025, Japan's Ministry of Environment (ME) published a request to collect hazardous information concerning general chemical substances and priority assessment chemical substances. This solicitation aims to gather data that are currently insufficient for proper risk assessment under Japan's Chemical Substances Control Law. The primary purpose of this request is to facilitate the prompt and appropriate evaluation of substances, particularly those lacking ecological effect hazardous information, thereby preventing the application of default hazardous classes or inaccurately low "Predicted No-Effect Concentrations" due to data uncertainty.

To ensure appropriate and swift evaluation, the ME is particularly seeking ecotoxicity-related hazardous information. Businesses, including manufacturers and importers, who possess relevant data for these substances are encouraged to provide comments. The deadline for providing the requested information is 31 July 2025.

More information can be found in this announcement from the ME.

Philippines

Draft Chemical Control Order for benzene and updates to the Philippine Inventory of Chemicals and Chemical Substances (draft)

In May 2025, the Philippine Department of Environment and Natural Resources (DENR) released a draft Chemical Control Order (CCO) for benzene under Republic Act 6969 and related legislation. The draft regulation proposes a comprehensive control framework covering the importation, manufacture, distribution, use, storage, and disposal of benzene and benzene-containing mixtures (defined as mixtures with >1% benzene by volume). It applies to importers, manufacturers, distributors, and both industrial and commercial users, while exempting uses already regulated under other laws (e.g., fuels, pharmaceuticals, and pesticides).

Unless no technically and economically feasible alternatives are available, the draft CCO prohibits the importation, manufacture, or use of benzene in various industrial applications, including paints, adhesives, coatings, inks, dyes, textile treatment solutions, and industrial degreasers. Covered entities will be required to register through the Online Permitting and Monitoring System, secure an importation clearance (valid for six months), and comply with operational controls such as proper storage, labeling, personal protective equipment use, incident response planning, and substitution planning. Specific documentation and environmental permits must be submitted as part of the registration process.

The CCO introduces compliance monitoring via regular self-monitoring reports, with regional DENR offices authorized to conduct inspections and enforce restrictions. The DENR may revise requirements and penalties, and the order will take effect fifteen days after publication in a newspaper of general circulation.

In parallel, the DENR also published the 2024 update to the Philippine Inventory of Chemicals and Chemical Substances listing 81 new substances with their CAS numbers.

Violations are subject to administrative and criminal sanctions under Republic Act 6969 and relevant DENR administrative orders.

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Taiwan

Amendment to the "Announced Matters concerning Managed Toxic Chemical Substances and their Operation Management" and updates to the lists of toxic chemical substances and chemical substances of concern (in force)

The Ministry of Environment (ME) published an amendment to the "Announced Matters concerning Managed Toxic Chemical Substances and their Operation Management". The primary purpose of the amendment is to revise the lists of toxic chemical substances subject to control, their control concentrations, graded operation volumes, and associated management and restriction requirements. The amendment updates the scope of substances covered and clarifies permitted and prohibited operations, along with setting deadlines for compliance actions for substances already being operated.

The "Announced Matters concerning Managed Toxic Chemical Substances and their Operation Management" notice is divided into schedules, including:

- Appendix 2: lists specific prohibited operation matters for announced managed toxic chemical substances
- Appendix 3: provides a list of permitted uses for announced managed toxic chemical substances and notes that for Class 1 to Class 3 substances, operation is restricted to the listed uses, unless prohibited by Appendix 2; any proposed uses not listed, or requests to lift prohibitions, require specific application procedures
- Appendix 4: details requirements and deadlines for specific substances already in operation

The amendment adds perfluorooctane sulfonic acid (PFOS; CAS No. 1763-23-1) salts and related compounds, perfluorooctanoic acid (PFOA) salts and related compounds, nonylphenols (NP) and nonylphenol ethoxylates (NPEO) to the List of Toxic Chemical Substances and the addition of cybutryne (CAS No. 28159-98-0) to the List of Concerned Chemical Substances.

Appendix 4 sets deadlines for the enforcement of the new restrictions on these substances:

- specific PFOS (CAS 1763-23-1, 29457-72-5, 307-35-7) and specific PFOA (CAS 335-67-1) below 0.01%: deadlines range from the announcement date, 13 May 2025, to 1 November 2025 for various actions
- other PFOS and PFOA: deadlines for various requirements apply from 1 June 2025 to 1 December 2025
- NP (CAS 25154-52-3, 84852-15-3) and NPEO (CAS 9016-45-9, 26027-38-3):
  - for concentrations equal to or higher than 5% requirements are immediately in force for some actions (record-keeping, labeling, etc.); the deadline for permit, registration and/or approval changes is 1 December 2026
  - for concentrations equal or higher than 0.1% but lower than 5% deadlines range from 1 June 2025 to 1 June 2026 for various requirements

The amendment entered into force on the day it was published, 13 May 2025. Additional information can be found here in Chinese.

On 8 May 2025, the ME published an amendment to the lists of toxic chemical substances and chemical substances of concern. The update introduces regulatory controls on PFOS, PFOA, their salts and related compounds, NP, NPEO, and cyclobutane. These substances have been listed due to concerns over persistence, bioaccumulation, endocrine disruption, and toxicity.

Taiwan has adopted five PFOS-related compounds and 352 PFOA-related compounds in line with the Stockholm Convention, restricting their uses accordingly. NP and NPEO, already regulated, are now subject to a stricter concentration

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limit of 0.1% in cleaning products and are banned from import under the Waste Disposal Act. Cyclobutane has been newly listed as a chemical of concern and is prohibited in anti-fouling paints and systems. A transition period of 1.5 to 2 years is granted to existing operators. Annexes accompanying the amendment detail the revised lists, operational requirements, and applicable control measures.

Penalties are not mentioned in the update. More information can be found here in Chinese.

Updates to the national standard for classifying and labeling hazardous chemicals (published)

On 25 April 2025, Taiwan's Bureau of Standards, Metrology, and Inspection (BSMI) published updates (can also be found here in Chinese) to its national standard for classifying and labeling hazardous chemicals to align with the 8th revised edition of the United Nations (UN) Globally Harmonized System (GHS 8). This alignment updates Chinese National Standard (CNS) 15030:2025, replacing the previous 2015 version, and forms part of Taiwan's ongoing efforts to harmonize its chemical management system with international standards. The GHS-aligned CNS 15030 series form the core of Taiwan's chemical classification and labeling framework. The update follows the Ministry of Economic Affairs' announcement in 2024 of its intent to transition to GHS 8, first published by the UN in 2019, to enhance chemical hazard communication and consistency.

The amendment includes updates to the following standards within the CNS 15030 series:

- CNS 15030:2025 – general rules for classification and labeling of chemicals (replaces CNS 15030:2015)
- CNS 15030-27:2025 – classification and labeling for chemicals hazardous to the aquatic environment (replaces CNS 15030-27:2008)
- CNS 15030-28:2025 – classification and labeling for chemicals hazardous to the ozone layer (replaces CNS 15030-28:2015)

The updated standards reflect revised classification criteria and labeling provisions introduced in GHS 8, such as refinements in hazard categories and labeling elements for environmental hazards. These changes may require companies to reassess chemical classifications, revise safety data sheets, and update hazard communication on product labels accordingly.

For businesses involved in chemical manufacturing, import, or supply in Taiwan, compliance with the updated CNS standards is essential to ensure consistency with the revised hazard definitions and avoid disruption in the domestic market. The GHS-aligned standards continue to apply across the CNS 15030 series, which includes thirty parts covering various hazard classes.

The revised standards entered into force upon publication on 25 April 2025. There are no penalties specifically associated with this update, but failure to comply with CNS standards may result in regulatory enforcement under Taiwan's chemical safety regulations.

Additional information can be found here in Chinese.

Amendment to the draft Resource Recycling and Utilization Act (published)

The Resource Recycling and Reuse Act (the Act) was enacted and promulgated on 3 July 2002 and was implemented one year after promulgation. It was amended and implemented on 21 January 2009. In order to keep pace with the international community and take into account the needs of sustainable development, Taiwan aims to establish a resource

recycling promotion environment and improve the relevant legal basis, turning from the current end-of-life waste recycling and treatment to expanding the resource recycling of the entire life cycle of the product, so as to achieve the policy goal of "maximizing the benefits of resource recycling and minimizing the final treatment of waste". The specific directions of this amendment include:

- formulating a national overall resource recycling plan
- establishing a resource recycling promotion committee
- green design standards using recycled particles (materials) in products and projects
- reducing the amount of materials at the source and prohibiting and restricting their use
- extending the product life
- digital product tracking
- public sector priority procurement
- incentive and subsidy measures
- resource recycling land
- recycling financing and investment
- and resource recycling experimental sandbox

The main points of the amendment are as follows:

- Amendment Article 9 adds the central relevant authorities to promote resource recycling and their powers and responsibilities
- Amendment Articles 11 and 12 add the following:
  - the central competent authority should formulate a national overall resource recycling plan
  - the municipal and county (city) competent authorities should formulate a resource recycling action plan based on it
  - the central competent authority shall set up a resource recycling promotion committee to provide advisory opinions
- Amendment Articles 13 to 16 add that the central competent authority may establish green design standards for products and construction projects, and announce that products or construction projects of a certain scale and type must comply with green design standards and use recycled particles (materials)
- Amendment Article 17 add that the central competent authority may specify and announce the reuse targets and methods of packaging and containers of items, and specify that businesses should report packaging and container reuse plans

There are no penalties specified in this update.

More information can be found here in Chinese.

Notice of the draft amendment to some articles of the Waste Disposal Act (draft)

On 29 May 2025, the Ministry of Environment (ME) published a draft amendment to the Waste Disposal Act. The amendment primarily aims to transform Taiwan's economy from a linear model to a circular economy, with the ultimate goals of achieving net-zero emissions and zero waste by 2050. The draft amendment proposes a comprehensive waste management mechanism that includes expanding the scope of responsible operators, unifying reuse rights, controlling reuse processes, and tracking the flow of construction surplus earth and stone. This legislative effort is a response to persistent challenges such as environmental overload and resource depletion, and it seeks to align Taiwan with international sustainable development trends.

Key regulatory changes that are proposed include:

- wider responsibilities – obligations now cover both general and industrial waste; renewable energy equipment producers (e.g., solar panel manufacturers) must handle recycling and disposal at end-of-life
- centralized reuse oversight – the ME will certify recycled products, monitor usage, and manage quality; subsidies and levies may be applied to boost uptake
- earthwork tracking – a national system mandates real-time reporting and surveillance to prevent illegal dumping of construction surplus
- tougher enforcement – stricter fines and prison terms apply, with joint liability for company leaders; cleanup costs will take priority over other debts

There is a sixty-day public consultation period ending on 28 July 2025 for the draft amendment. The Act takes effect 30 days after promulgation, except for certain industrial waste provisions, which begin two years later. Penalties include fines up to NT$20 million and imprisonment of up to ten years, with joint liability for company leaders and stakeholders.

More information can be found in Chinese in this notice.

EUROPE

European Union

Rules for the application of the Deforestation Regulation (published)

The European Union's (EU's) Implementing Regulation 2023/1115, effective from 19 May 2025, supports the EU Deforestation Regulation by establishing a benchmarking system to classify countries as low, standard, or high risk based on their likelihood of producing commodities (e.g., rubber, wood that could be relevant to the defense and aerospace industry) linked to deforestation, as outlined in Article 29 of Regulation (EU) 2023/1115. This classification, detailed in the regulation's Annex, uses quantitative data from sources like the United Nations' Food and Agricultural Organization's Global Forest Resources Assessment and qualitative criteria, such as deforestation rates and local compliance, to guide operators' risk assessments.

Companies must incorporate these country risk classifications into their due diligence risk assessments – Article 10(2)(a) – to ensure products are deforestation-free, sourced from land not deforested after 31 December 2020, and compliant with local laws. Low-risk countries allow simplified due diligence (Article 13), while high-risk countries require enhanced scrutiny. Large operators must comply by 30 December 2025, and micro/small enterprises by 30 June 2026. Non-compliance penalties, enforced by EU Member States, include fines up to 4% of an operator's EU annual turnover, confiscation of products or revenues, and potential exclusion from public procurement for up to 12 months. Companies may need to align supply chain risk assessments with the benchmarking system to mitigate compliance risks.

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Amendments to the Classification, Labeling, and Packaging Regulation to update harmonized classifications for multiple substances (published)

On 20 June 2025, the European Commission (EC) published Commission Delegated Regulation (EU) 2025/1222, which amends Annex VI, Part 3, Table 3 of the Classification, Labeling, and Packaging (CLP) Regulation (Regulation (EC) No 1272/2008) to introduce new and updated harmonized classifications for multiple substances. These amendments are based on opinions adopted by the European Chemicals Agency's Committee for Risk Assessment (RAC) between March and September 2023, followed by further assessment by the EC. The annex includes both new entries (e.g., ozone, dinitrogen oxide, barium chromate) and revised entries (e.g., α-methylstyrene, vinylidene chloride). From 10 July 2025, suppliers may voluntarily apply the new classifications. Full compliance becomes mandatory from 1 February 2027, allowing a transition period for updating classification, labeling, and packaging.

Penalties are determined by Member States.

New restrictions on N,N-dimethylacetamide and 1-ethylpyrrolidin-2-one (published)

European Commission Regulation (EU) 2025/1090 amends Annex XVII of Regulation (EC) No 1907/2006 (REACH) to introduce new restrictions on the manufacture, use, and placing on the market of N,N-dimethylacetamide (DMAC; EC No. 204-826-4; CAS No. 127-19-5) and 1-ethylpyrrolidin-2-one (NEP; EC No. 220-250-6; CAS No. 2687-91-4), two solvents classified as toxic to reproduction (Category 1B). The amendment sets binding derived no-effect levels (DNELs) to limit worker exposure and harmonize chemical safety documentation across the European Union (EU).

REACH regulates the manufacture and use of chemical substances within the EU. This amendment follows an Annex XV dossier submitted by the Netherlands, which identified inadequate control of occupational exposure to DMAC and NEP despite existing measures. The regulation modifies Annex XVII by specifying DNELs and conditions of use, including concentration thresholds, substance identifiers, and a transitional period for certain industrial applications.

From 23 December 2026, DMAC and NEP may not be placed on the market or used in concentrations equal to or above 0.3% unless DNELs are included in chemical safety reports and safety data sheets, and exposure is controlled accordingly. The DNELs are:

- DMAC: 13 milligrams per cubic meter (mg/m^3) (inhalation), 1.8 milligram per kilogram (mg/kg) per day (dermal)
- NEP: 4.0 mg/m^3 (inhalation), 2.4 mg/kg/day (dermal)

Penalties for non-compliance are enforced at the Member State level under Article 126 of REACH and may include fines or other legal measures.

Correction to the addendum to REACH regarding microplastics (published)

On 27 September 2023, the European Commission published an amendment to Annex XVII of Regulation (EC) No 1907/2006 (REACH) regarding synthetic polymer microparticles. This adds a new entry, Entry 78, to Annex XVII, to restrict the placing on the market of microplastics intentionally added to products in concentrations equal to or above 0.01% by weight.

A corrigendum to this amendment has subsequently been published correcting the wording used, with the corrigendum removing the use of "substances" to refer to polymer microparticles and making other minor wording changes.

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Amendment to Decision 2000/532/EC in relation to battery-related waste (published)

On 20 May 2025, the European Commission published Delegated Decision (EU) 2025/934 amending Decision 2000/532/EC to update the list of waste in relation to battery-related waste. The amendment reflects new battery chemistries, including lithium-based, sodium-based, and nickel-based batteries, and developments in battery manufacturing and recycling.

The updated Annex introduces new and revised waste codes covering battery manufacturing waste, waste batteries, and intermediate fractions from treatment processes. Hazardous waste classifications are updated based on waste origin and composition, in line with Annex III of Directive 2008/98/EC and Regulation (EC) No 1272/2008.

The amendment also aligns the list of waste with Regulation (EU) 2023/1542 and aims to support improved sorting, recycling, and reporting of battery-related waste. The Decision enters into force on 9 June 2025 and will apply from 9 November 2026.

Penalties are not mentioned in the update.

Harmonized classification and labeling intentions/consultations for eight substances and classification, labeling, and packaging proposals for four substances (intention)

The European Chemicals Agency (ECHA) has announced three new harmonized classification and labeling intentions for the following chemicals:

Methyl 4-hydroxybenzoate (EC No: 202-785-7; CAS No: 99-76-3) is used as an intermediate and in formulation in the chemical industry, in plant protection products, in medical products, and in cosmetics. The proposed CLH classification is:

- ED ENV 1, EUH430
- endocrine disruptor for human health

Hydrogen chloride (EC No: 231-595-7; CAS No: 7647-01-0) is used in biocides, cleaning products, pH regulators, water treatment products, water treatment chemicals, welding and soldering products, and laboratory chemicals. The proposed CLH classification is:

- met. corr. 1, H290
- acute tox. 3, H331
- skin corr. 1, H314
- eye dam. 1, H318

Silver chloride (EC No: 232-033-3; CAS No: 7783-90-6) is used in biocides and in photo-chemicals. The proposed CLH classification is:

- skin sens. 1, H317
- muta. 2, H341
- repr. 1B, H360FD
- STOT RE 2, H373
- aquatic acute 1, H400
- aquatic acute 1, M-factor=1000
- aquatic chronic 1, H410
- aquatic chronic 1, M-factor=100

The CLH dossier for these intentions now needs to be submitted and a consultation will take place before ECHA's Socio-Economic Analysis Committee Riks Assessment Committee publish their opinions. If the EC adopts the proposed classifications, new labeling and packaging requirements might apply.

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On 26 May 2025, ECHA launched five new public consultations under the CLH process, in accordance with Regulation (EC) No 1272/2008 (CLP). The consultations concern proposals submitted by Germany and Belgium for substances with varied industrial uses. All five substances have been assessed by the respective dossier submitters, and hazard classes are now open for public comment until 25 July 2025.

Germany submitted CLH proposals for:
Trifluoroacetic acid (EC No. 200-929-3; CAS No. 76-05-1) is used to remove protecting groups such as Boc used in organic chemistry and peptide synthesis. The proposed new harmonized classification proposed by Germany is:

- repr. 1B, H360fD
- acute tox. 3, H331
- skin corr. 1A, H314
- aquatic chronic 3, H412
- PMT, EUH450
- vPvM, EUH451
- inhalation ATE = 5 mg/L (vapors)
- note B

Germany also proposed harmonized classification for sodium trifluoroacetate (EC No. 220-879-6; CAS No. 2923-18-4) – used in a range of applications in organic synthesis, fluorine chemistry, and analytical chemistry – and other inorganic salts of trifluoroacetic acid:

- epr. 1B, H360fD
- PMT, EUH450
- vPvM, EUH451

Belgium proposed CLH classification for N-[3-({[2,2-dimethyl-3-(morpholin-4-yl)propylidene]amino}methyl)-3,5,5-trimethylcyclohexyl]-2,2-dimethyl-3-(morpholin-4-yl)propan-1-imine (EC No. Not available; CAS No. 1217271-02-7):

- skin irrit. 2, H315
- eye irrit. 2, H319
- skin sens. 1, H317

Belgium also proposed CLH classification for N,N'-hexane-1,6-diylbis[2,2-dimethyl-3-(morpholin-4-yl)propan-1-imine] (EC No. not available; CAS No. 1217271-49-2). The proposed new harmonized classification is:

- skin irrit. 2, H315
- eye dam. 1, H318
- skin sens. 1, H317

Also, Belgium proposed CLH classification for di(morpholin-4-yl) disulphide (EC No. 203-103-0; CAS No. 103-34-4): skin sens. 1A, H317.

Further, ECHA has opened consultations on newly proposed harmonized CLP regulation for four chemicals. If these proposals are approved, new labeling and packaging requirements might apply. The consultations are open until 15 August 2025.

Reaction products of 2,2-dimethyl-3-(morpholin-4-yl)propanal and propylidynetrimethanol, propoxylated, reaction products with ammonia (EC and CAS Nos. not available) are used in various products including adhesives, sealants, coatings, fillers, plasters, etc. The proposed classification is:

- eye irrit. 2, H319
- skin sens. 1B, H317

Flocoumafen (ISO); reaction mass of: cis-4-hydroxy-3-(1,2,3,4-tetrahydro-3-(4-(4-trifluoromethylbenzyloxy)phenyl)-1-naphthyl)coumarin and trans-4-hydroxy-3-(1,2,3,4-tetrahydro-3-(4-(4-trifluoromethylbenzyloxy)phenyl)-1-naphthyl)coumarin (EC No. 421-960-0; CAS No. 90035-08-8) is used as a rodenticide. The proposed classification is:

- repr. 1B, H360D,
- STOT RE 1, H372
- acute tox. 1, H300
- acute tox. 1, H310

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- acute tox. 1, H330
- aquatic acute 1, H400
- aquatic acute 1, M-factor=10
- aquatic chronic 1, H410
- aquatic chronic 1, M-factor=10
- repr. 1B; H360D: C ≥ 0,003 %
- STOT RE 1; H372 (blood): C ≥ 0,05 %
- STOT RE 2; H373: 0,005 % ≤ C < 0,05 %
- oral: ATE = 0.13mg/kg
- dermal: ATE = 0.43mg/kg
- inhalation: ATE = 0.0006mg/l (dusts or mists)

4-morpholinecarbaldehyde (EC No. 224-518-3; CAS No. 4394-85-8) is used in cleaning products, adhesives, polishes, anti-freeze, coatings, surface treatments, leather treatments, lubricants, inks and toners, etc. The proposed classification is skin sens. 1B, H317.

2,2-dimethyl-3-(morpholin-4-yl)propanal (EC No. not available; CAS No. 23588-51-4) is used in consumer articles such as adhesives, sealants, coatings, fillers, modeling clay, and polymers, primarily used by professional workers. In workplaces, it is employed in low-energy material manipulation activities involving complex articles like vehicles and electronic appliances where no release is intended. At industrial sites, this substance is used in adhesives and sealants, and professional workers use this substance extensively in the building and construction sectors. The proposed classification is:

- skin corr. 1, H314
- eye dam. 1, H318
- skin sens. 1B, H317

Amendment to Regulation (EC) 1272/2008 on the classification, labeling and packaging of substances and mixtures (initiative)

In June 2025, the European Commission has notified of an initiative to amend the Regulation (EC) 1272/2008 on classification, labeling, and packaging of substances and mixtures (EU CLP). A Delegated Regulation is in preparation to align EU CLP with the United Nation's Globally Harmonized System (GHS) revisions 8 to 10 and partially implements GHS revision 11 (aerosols and skin sensitizers mixtures). A draft of the regulation has not been published and adoption of the legislation is expected in Quarter 4 of 2025.

Fourth Simplification Omnibus Package and the Defense Rediness Omnibus Bill (announced)

On 21 May 2025, the European Commission (EC) announced simplification measures, dubbed the fourth Simplification Omnibus package, to save the European Union (EU) businesses €400 million annually. These proposed reforms streamline compliance through reduced reporting, digitized processes, and harmonized regulations, with a focus on supporting small and medium enterprises (SMEs). Aimed at boosting competitiveness while upholding consumer and environmental standards, the measures will roll out in 2025, with the aim of enhancing economic resilience and innovation for industries including aerospace and defense industries.

On 17 June 2025, the EC released the Defense Readiness Omnibus Bill (DRO) that is designed to bolster the EU's defense preparedness and remove regulatory bottlenecks hampering the defense ecosystem. This initiative builds on the White Paper on European Defense-Readiness 2030 and answers a call by EU leaders in March 2025 for a more sovereign and better-equipped Europe. The DRO aims to mobilize up to €800 billion in defense investment by 2030, streamline rules across procurement, permitting intra-EU transfers, and integrate defense considerations into the EU's sustainable finance framework.

Five exemptions and one revocation request under the restrictions on electrical and electronic equipment (consultation)

The Öko-Institut has opened a consultation, on behalf of the European Commission, for five requests for exemptions and one request for revocation of an exemption under European Union restrictions on electrical and electronic equipment (EU RoHS) for the use of lead and mercury in multiple electronic applications. EU RoHS stands for Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (EEE). This directive regulates which substance can be present in EEE. It includes several exemptions for the use of banned substances in specific applications. The consultation is open until 1 August 2025.

Revisions to the carbon border adjustment mechanism rules as part of the "Omnibus I" simplification package (announced)

On 18 June 2025, the European Parliament and Council reached a provisional agreement as part of the "Omnibus I" simplification package, initially introduced on 26 February 2025. A major update is the creation of a de minimis threshold: importers bringing in up to 50 tonnes per year of relevant goods (iron, steel, aluminum, cement, fertilizers) will now be exempt from the Cabon Border Adjustment Mechanism (CBAM) rules, replacing the previous negligible value exemption. This change is designed to relieve about 90% of importers from the administrative burden, while still covering 99% of total CO_2 emissions from those goods.

Other simplifications in the deal include streamlined procedures for import authorization, emissions calculations, verification rules, and financial liability for CBAM declarants, alongside enhanced anti-abuse safeguards. Once the agreement is formally approved, it will enter into force three days after publication in the European Union's (EU's) Official Journal. While no new fines or fee structures are introduced, the CBAM's fee mechanism remains in place: importers must purchase CBAM certificates corresponding to the CO_2 emissions of their goods—aligned with the EU's emissions trading system pricing (post transitional period).

Ireland

National policy statement and roadmap on circular textiles (consultation)

Ireland has opened a consultation on a proposed national policy statement and roadmap on circular textiles. Under this proposal textiles are defined as products of clothing, footwear, and interior furnishings (e.g., carpets, curtains, bedding, furniture) composed of at least 80% by weight of textile fibers as set out in the European Union Textile Labeling Regulation.

The proposal sets out a vision, common principles, strategic objectives, and next steps for the future development of the textile circular economy. Some of the proposed key strategic actions include:

- developing a regulatory framework across the textiles value chain
- developing Extended Producer Responsibility systems for textiles
- supporting investment in and development of national and regional infrastructure across the textile value chain
- supporting Green Public Procurement in textiles

The consultation is open until 7 July 2025.

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Netherlands

Notice of entry into force of amendments to Annex A of the Stockholm Convention (announced)

On 3 June 2025, the Ministry of Foreign Affairs of the Netherlands published notice of the entry into force of the 12 May 2023 amendments to Annex A of the Stockholm Convention on Persistent Organic Pollutants (POPs). The Stockholm Convention is a global treaty aimed at protecting human health and the environment from POPs by eliminating or restricting their production, use, and release. The 2023 amendments, adopted at the 11th Conference of the Parties, entered into force for the European part of the Kingdom of the Netherlands on 26 February 2025.

Annex A lists POPs that are subject to elimination. The Stockholm Convention allows parties to register specific exemptions for a specific period of time. The 2023 amendments added three substances: methoxychlor, dechlorane Plus, and UV-328. Methoxychlor is listed without exemptions, while dechlorane plus and UV-328 are subject to specific exemptions, as outlined in Conference decisions SC-11/10 and SC-11/11. These substances are primarily used in pesticide formulations and as flame retardants or stabilizers in plastics and coatings. Dutch stakeholders must now comply with the updated obligations concerning these substances under national implementing legislation.

Penalties are not mentioned in the update.

More information can be found in Dutch in this announcement.

Switzerland

Revision to the Chemical Risk Reduction Ordinance (draft)

On 28 May 2025, Switzerland notified the World Trade Organization (WTO) of a draft revision to the Chemical Risk Reduction Ordinance (ORRChem; SR 814.81), aligning national chemical restrictions with recent changes under EU REACH and international conventions including the Stockholm and Montreal Protocols. The proposed amendments introduce new prohibitions and restrictions on the manufacture, placing on the market, and use of several substances and substance groups.

Key proposed changes include:

- dechlorane plus (EC No. 236-948-9; CAS No. 13560-89-9) and UV-328 (EC No. 247-384-8; CAS No. 25973-55-1) – prohibition of manufacture, marketing, and use, including in preparations and articles, with temporary exemptions for specific applications
- perfluorohexanoic acid (PFHxA; EC No. 206-196-6; CAS No. 307-24-4) and its precursors – market bans in applications such as food-contact paper, textiles, ski waxes, and cosmetics, based on EU Regulation 2024/2462
- Microplastics – market bans on preparations containing microplastics, with exemptions and phase-in periods mirroring EU Regulation 2023/2055
- lead (EC No. 231-100-4; CAS No. 7439-92-1) in polyvinyl chloride (PVC) – restrictions for lead-based thermal stabilizers, aligned with EU Regulation 2023/925, with exemptions for recycled PVC
- formaldehyde (EC No. 200-001-8; CAS No. 50-00-0) – emission limits on articles and road vehicles to reduce indoor exposure, in line with EU Regulation 2023/1464
- fluorinated substances – new restrictions on ozone-depleting substances, fluorinated greenhouse gases, hydrofluoroolefins (a.k.a. HFOs), and fluorinated ketones in foams, switchgear, aerosol dispensers, and heating, HVAC (i.e., heating, ventilation, and air conditioning) systems, based on EU Regulation 2024/573

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The proposed revision aims to strengthen human health and environmental protection and harmonize Swiss regulation with EU standards.

United Kingdom

Approach outlining how the persistent, mobile, and toxic and very persistent, very mobile concepts support UK REACH risk management of per- and polyfluoroalkyl substances (published)

In 2025, the United Kingdom (UK) published an approach outlining how the persistent, mobile, and toxic (PMT) and very persistent, very mobile (vPvM) substance concepts can support regulatory decision-making under UK REACH, with an initial focus on managing the risks of poly- and perfluoroalkyl substances (PFAS). The update reflects growing concern over the environmental and human health risks associated with PFAS, especially due to their extreme persistence and ability to travel through soil and water into remote environments.

Current regulations under UK REACH can address these substances to some extent, but there is a gap when it comes to substances that are persistent and mobile but not necessarily bio-accumulative or acutely toxic by standard criteria. The PMT/vPvM framework aims to close this gap, offering a more precautionary and scientifically grounded basis for identifying and managing hazardous substances that threaten water quality and environmental integrity.

The approach draws on the European Union's (EU's) PMT and vPvM classification criteria under the EU classification, labeling, and packaging (CLP) regulation (Annex A), but these have not yet been formally adopted in UK REACH or UK CLP. The UK is still engaging in international discussions on harmonization through the United Nations Globally Harmonized System (GHS).

The PMT/vPvM concept focuses on the combination of persistence, mobility, and toxicity to prioritize substances for regulatory action:

- persistence refers to a substance's resistance to environmental degradation
- mobility concerns its ability to travel through environmental media (especially soil to water)
- toxicity focuses on harmful effects at low concentrations or through chronic exposure

While PBT/vPvB criteria exist in UK REACH, many PFAS fall outside those definitions despite being environmentally hazardous. The PMT framework enables such substances to be considered for regulation due to their long-term contamination potential and difficulty of removal.

Currently, the UK is using this concept as part of its PFAS risk management strategy. It is being used to support the preparation of restriction dossiers under UK REACH and determine whether substances present a risk not adequately controlled. The UK approach aligns with the precautionary principle and supports the adoption of a non-threshold approach to risk management for these substances, meaning that any level of release may pose a risk, and emissions should be minimized to the lowest possible levels.

There are no legally binding thresholds or classification obligations in place yet, but the UK is considering how to integrate PMT/vPvM criteria into future regulatory frameworks. A UK research project is underway to improve screening and assessment tools, and further develop internationally accepted criteria and test methods, with potential OECD (i.e., Organization for Economic Co-operation and Development) test guideline development in view.

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The UK is progressing toward the integration of PMT and vPvM substance concepts in chemical risk management, beginning with PFAS as a priority group. These concepts will be applied to support restriction dossiers under UK REACH and inform future regulatory development. While formal criteria are not yet adopted, the UK is aligning with EU CLP developments and engaging in UN GHS discussions on classification. Research is ongoing to refine identification methods, improve regulatory modelling, and develop predictive tools.

Reforms to key areas of chemical legislation (consultation)

On 23 June 2025, the Health and Safety Executive (HSE) launched a public consultation on proposed reforms to key areas of chemicals legislation in Great Britain. The consultation supports the United Kingdom's broader plan to stimulate economic growth by ensuring regulation enables innovation and productivity. It focuses on potential changes to the frameworks for classification, labeling, and packaging and the export and import of hazardous chemicals under the Prior Informed Consent regime. These proposals form part of HSE's 2022–2032 strategy and aim to modernize regulatory approaches, reduce costs for businesses, and respond to evolving political, technological, and environmental developments. The consultation is open until 18 August 2025, after which stakeholder input will be reviewed to refine the proposals and inform legislative action.

NORTH AMERICA

Canada

Final guidelines regarding environmental claims (published)

On 5 June 2025, the Canadian Competition Bureau (CCB) published the final guidelines on environmental claims. These guidelines are designed to help businesses ensure compliance with the Competition Act when making environmental claims. The Competition Act is Canada's primary federal legislation governing business conduct to promote and maintain fair competition in the marketplace. It prohibits anti-competitive practices such as price-fixing, abuse of dominance, deceptive marketing, and certain mergers that lessen competition. Companies in Canada are free to make any environmental claims they wish as long as they are not false or misleading and have been adequately and properly tested or substantiated where required.

The guidelines describe the different environmental claim categories that can be made, how the CCB, and in some cases the court, interpret the requirements for the environmental claim to be compliant with the Competition Act, and give examples. The guidelines also break down and explain the compliance principles, mainly:

- environmental claims should be truthful, and not false or misleading
- environmental benefits of a product and performance claims should be adequately and properly tested
- comparative environmental claims should be specific about what is being compared
- environmental claims should avoid exaggeration
- environmental claims should be clear and specific – not vague
- environmental claims about the future should be supported by substantiation and a clear plan

Finally, the guidelines include a Frequently Asked Questions section. These guidelines do not include compulsory requirements but are meant to be used as a guide to ensure compliance under the Competition Act.

There are no penalties associated with this update at this time.

Ministerial conditions regarding carbopolycycle, acid-treated, oxidized and 1,3,5-triazine-2,4,6(1H,3H,5H)-trione (published)

On 21 June 2025, the Department of the Environment published two ministerial orders. Ministerial Condition No. 21194a is a variation concerning the substance carbopolycycle, acid-treated, oxidized (CAS No. not available), while Ministerial Condition No. 22160 is a new condition applying to the substance 1,3,5-triazine-2,4,6(1H,3H,5H)-trione (CAS No. 69004-04-2). Both conditions were issued under section 84(1)(a) of the Canadian Environmental Protection Act, 1999 (CEPA), based on suspicions that the substances are, or could become, toxic under section 64 of the Act. These conditions permit the manufacture and import of the substances, subject to specific restrictions intended to mitigate potential environmental and health risks. Under both conditions, the notifier is permitted to manufacture or import the substance under strict use and handling restrictions.

For Condition 21194a, the substance can only be used as a precursor or as an additive in concrete, fuel, anti-corrosion, or icephobic products, with additional limits on particle generation and industrial application. For Condition 22160, Canadian manufacturing requires a 120-day advance notice with detailed process and exposure information. Both conditions mandate that any release to the environment must be immediately controlled and reported and require that all transferees be informed in writing and agree to comply with the ministerial conditions. Importers, manufacturers, and distributors must maintain detailed records of use, transfers, and disposal for at least five years.

Ministerial Condition No. 21194a came into force on 20 May 2025, and No. 22160 on 26 March 2025. Both require prompt action in the event of environmental release and establish comprehensive compliance documentation. There are no penalties explicitly stated in the official summaries, but non-compliance may be subject to enforcement under CEPA.

United States

Final rule requiring manufacturers and importers to submit unpublished health and safety data under the Toxic Substances Control Act (effective)

The United States Environmental Protection Agency (EPA) has finalized a rule under the Toxic Substances Control Act (TSCA) that requires manufacturers, including importers, of sixteen chemicals to report unpublished health and safety studies to the EPA by adding the substances to the list of chemicals subject to the provisions of part 716 of TSCA. The rule was published and became effective on 9 June 2025. The chemicals affected by the rulemaking are as follows:

- 4,4-methylene bis(2-chloraniline) (CAS No. 101–14–4)
- 4-tert-octylphenol(4-(1,1,3,3-Tetramethylbutyl)-phenol) (CAS No. 140–66–9)
- acetaldehyde (CAS No. 75–07–0)
- acrylonitrile (CAS No. 107–13–1)
- benzenamine (CAS No. 62–53–3)
- benzene (CAS No. 71–43–2)
- bisphenol A (CAS No. 80–05–7)
- ethylbenzene (CAS No. 100–41–4)
- naphthalene (CAS No. 91–20–3)

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- vinyl chloride (CAS No. 75–01–4)
- styrene (CAS No. 100–42–5)
- tribomomethane (bromoform) (CAS No. 75–25–2)
- triglycidyl isocyanurate; (CAS No. 2451–62–9)
- hydrogen fluoride (CAS No. 7664–39–3)
- N-(1,3-Dimethylbutyl)-N'-phenyl-p-phenylenediamine (6PPD) (CAS No. 793–24–8)
- 2-anilino-5-[(4-methylpentan-2-yl) amino]cyclohexa-2,5-diene-1,4-dione (6PPD-quinone) (CAS No. 2754428–18–5)

Under the rule, manufacturers (including importers) who propose to or are currently manufacturing a listed chemical substance, or those who have manufactured or proposed to manufacture a listed substance in the last ten years, must provide i) copies of the health and safety studies regarding the listed substances in their possession, ii) list of studies that they are aware of but not in their possession, and iii) those initiated after the date the chemical was listed. The reporting deadline is 22 May 2026.

The health and safety studies sought by this rulemaking will help inform the EPA and aid in its decision making and future rulemaking regarding these chemicals under TSCA. There are no penalties associated with this update at this time.

Draft risk evaluations for dibutyl phthalate (DBP) and diethylhexyl phthalate (consultation)

The Environmental Protection Agency (EPA) published a notice in the Federal Register announcing the availability of and seeking public comments on the draft risk evaluations for dibutyl phthalate (DBP; CAS No. 84-74-2) and diethylhexyl phthalate (DEHP; CAS No. 117-81-7) under the Toxic Substances Control Act (TSCA). The primary purpose of these risk evaluations is to determine whether these chemical substances present an unreasonable risk of injury to health or the environment under their conditions of use, including to potentially exposed or susceptible subpopulations, without considering costs or other non-risk factors.

The risk evaluations will assess potential human health and environmental risks across conditions of use. These include lifecycle stages such as manufacturing, processing, distribution, use, and disposal. Draft risk evaluations for both substances will undergo peer review by the EPA Science Advisory Committee on Chemicals (SACC). The EPA is seeking feedback on the risk assessments of the above-mentioned chemicals, encouraging all interested parties, including individuals, governmental and non-governmental organizations, non-profit organizations, academic and research institutions, and private sector entities to provide input before 4 August 2025.

DBP and DEHP are commonly used as plasticizers, particularly in polyvinyl chloride (PVC). They are also used in adhesives, sealants, paints, coatings, rubbers, and certain non-PVC plastics. These substances are manufactured (including imported), processed, distributed, and disposed of across various industrial, commercial, and consumer use settings. According to the EPA's 2020 TSCA Chemical Data Reporting, between 2016 and 2019, DBP had an annual production volume ranging from 1 to 10 million pounds, while DEHP ranged from 10 to 50 million pounds. In December 2019, the EPA designated DBP and DEHP as high-priority substances for risk evaluation under TSCA. The draft scope documents were released for public comments in June 2020, and the final scopes were published in September 2020, incorporating stakeholder feedback.

OCEANIA

Australia

Seven chemicals added to the Australian Inventory of Industrial Chemicals (published)

The Australian Government has published a notification regarding the addition of chemicals added to the Australian Industrial Chemicals Introduction Scheme (AICIS) inventory five years after the issue of assessment certificates. The AICIS Inventory, or the Australian Inventory of Industrial Chemicals, is an online database that lists industrial chemicals available for use in Australia. It serves as a resource for importers and manufacturers to determine if a chemical is already listed and subject to AICIS regulations. The Inventory is managed by AICIS.

The chemicals added are as follows:

- silicic acid, ethyl 2-phenylethyl ester (CAS No. 891196-28-4)
- 1H,3H,5H-Oxazolo[3,4-c]oxazole, dihydro-7a-methyl-3,5-bis(2-phenylpropyl)- (CAS No. 2135288-33-2)
- 1H,3H,5H-Oxazolo[3,4-c]oxazole, 3,5-didecyldihydro-7a-methyl-, (CAS No. 2099012-24-3)
- 1H,3H,5H-Oxazolo[3,4-c]oxazole, 3,5-diheptyldihydro-7a-methyl-, (CAS No. 913171-06-9
- 1H,3H,5H-Oxazolo[3,4-c]oxazole, dihydro-7a-methyl-3,5-bis[2-(4-methyl-3-cyclohexen-1-yl)propyl]- (CAS No. 1416905-34-4)
- 1H,3H,5H-Oxazolo[3,4-c]oxazole, 3,5-bis(1,5-dimethyl-4-hexen-1-yl)dihydro- CAS RN 912938-30-8
- 1H,3H,5H-Oxazolo[3,4-c]oxazole, dihydro-3,5-bis[1-methyl-2-[4-(1-methylethyl)phenyl]ethyl]- CAS RN 1001164-15-3

Under the conditions of the addition of these chemicals, there is an obligation for manufacturers and importers to notify the authorities if the circumstances of said import or manufacture are different to those outlined in the assessments for a given substance.

SOUTH AMERICA

Brazil

Ban on certain mercury-containing fluorescent lighting products (consultation)

On 15 May 2025, Brazil's National Institute of Metrology, Quality and Technology (INMETRO) launched Public Consultation No. 14 to gather input on a proposed ban on certain mercury-containing fluorescent lighting products (comments due on 15 July 2025). The draft regulation would prohibit the manufacture, import, and commercialization of:

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- compact fluorescent lamps with ballast integrated into the base
- electromagnetic ballasts for tubular fluorescent lamps
- electronic ballasts powered by alternating current for tubular, circular, and compact fluorescent lamps

The proposal aligns with Brazil's commitments under the Minamata Convention on Mercury, which supports the global phase-out of compact fluorescent lamps by 2025. The planned transition dates are:

- manufacture and import prohibited from 31 December 2025
- commercialization by manufacturers and importers prohibited from 31 July 2026
- commercialization by distributors and retailers prohibited from 31 December 2026

INMETRO will maintain import control on customs codes for the affected products for five years after the final sales ban.

Information can be found in Portuguese in this announcement in the Official Gazette of the Union and comments can be provided in this consultation site.

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