Newsletter

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

IAEG

Vol.5, Issue 7

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 7 – 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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ASIA

China

Prohibition of production of polyurethane products using 1,1-dichloro-1-fluoroethane as a blowing agent (consultation)

On 2 July 2025, the Ministry of Ecology and Environment (MEE) launched a public consultation on a draft announcement (can also be found here in Chinese) to prohibit the production of polyurethane products using 1,1-dichloro-1-fluoroethane (HCFC-141b; CAS No. 1717-00-6) as a blowing agent. The measure aims to implement the obligations of the Vienna Convention for the Protection of the Ozone Layer, the Montreal Protocol on Substances that Deplete the Ozone Layer, and China's national HCFC phase-out management plan for the polyurethane foam industry.

Under the draft, the production of formulated polyether polyols and polyurethane products using HCFC-141b will be banned from 1 January 2026, except for spray polyurethane foam products, which will be banned from 1 July 2026. Existing bans on specific product categories such as refrigerators, refrigerated containers, electric water heaters, insulation pipes, and solar water heaters will remain governed by prior MEE announcements from 2018 and 2023.

The draft defines the scope of affected spray polyurethane foam products by reference to national standards, including JC/T 998, T/CECS 498, SC/T 8059, and GB/T 20219. The proposed ban follows feasibility studies and sector consultations and is based on the availability of alternative blowing agents, such as hydrocarbons, water, hydrofluorocarbons (HFCs), and hydrofluoroolefins. These alternatives are considered technically viable, though cost differences may vary.

Enterprises that violate the above regulations by using HCFC-141b will be subject to penalties imposed by environmental authorities in cooperation with relevant departments in accordance with the law.

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

Inclusion of sixteen mercury-added products to Schedule 3 of the Mercury Control Ordinance (published)

The Hong Kong Government added a list of newly regulated mercury-added products to schedule 3 in the Mercury Control Ordinance (Amendment of Schedule 3) Notice 2025 (additional information can also be found here). The update aligns Hong Kong's legislation with the Minamata Convention on Mercury, which is a global agreement targeting the reduction of anthropogenic mercury emissions. At its 2022 and 2023 meetings, the Convention agreed to progressively phase out 16 mercury-added products between 2025 and 2027, based on the availability of safer alternatives.

The update modifies Schedule 3 of the Mercury Control Ordinance to add sixteen mercury-added products. These include various electrical, electronic, lighting products, and cosmetics. The list is divided into two parts, with separate timelines depending on international applicability. The amendment prohibits the manufacture, import, export, and supply of the listed mercury-added products once the changes come into effect. The first eight product categories will be banned from 31 December 2025, while the effective dates for the remaining eight will be announced once the relevant international

provisions apply to the Hong Kong Special Administrative Region. A grace period will be granted until January 2029, during which continued supply will be tolerated to allow the public and businesses time to adapt. After this period, enforcement will begin, and prosecution will be initiated based on collected evidence. Companies dealing with regulated mercury-added products must prepare to cease activities related to these products by the applicable deadlines.

This update introduces a phased approach to eliminate high-risk mercury-added products from the market. The changes take effect on 31 December 2025 for the first group of products, with the remaining timelines pending further notice.

Penalties for non-compliance include a maximum fine of HK$50,000 and imprisonment for up to one year. The government also plans to update relevant guidelines to reflect enforcement and grace period arrangements.

Japan

119 New Chemical Substances added to the Industrial Safety and Health Law Inventory (published)

On 27 June 2025, 119 substances were added to the list of newly announced chemical substances under the Industrial Safety and Health Law (ISHL). The ISHL aims to ensure worker health and safety by promoting comprehensive and systematic countermeasures concerning the prevention of industrial accidents. Companies that manufacture or import a new substance into Japan must notify that substance prior to manufacture or import under the ISHL. A new substance is defined as any substance that is not on the ISHL Inventory, which consists of two parts:

- existing chemical substances under the Chemical Substances Control Law (on the Japanese market before 1973)
- new substances notified under ISHL and published in the government Gazette

The 119 substances notified under ISHL will no longer require notification to the ministry. New chemical substances new to the Japanese market that are not on the list must notify the MHLW when used or handled.

There are no penalties specified within this update. More information can be found here in Japanese.

Amendment to the Enforcement Order for the Act on the Promotion of Effective Utilization of Resources to promote decarbonization through the use of recycled plastics (consultation)

On 18 July 2025, Japan notified the World Trade Organization (WTO) of a draft amendment to the Enforcement Order for the Act on the Promotion of Effective Utilization of Resources. A public consultation is open on the draft amendment until 16 September 2025. The draft amendment introduces a new category of products, "Specified Decarbonization Recycled Resources Utilization Promoted Products," to promote decarbonization through the use of recycled plastics. Manufacturers and importers of these products will be required to formulate plans on the use of recycled resources and submit regular reports to the government.

The designated products and their respective thresholds are:

- plastic containers and packaging (excluding those specified by Ministerial Ordinances) and automobiles (as defined in the Automobile Recycling Law), with a production volume or import sales volume of 10,000 units or more in the business year
- unit-type air conditioners, television receivers, electric refrigerators, and electric washing machines, each with a threshold of 50,000 units or more in the business year

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The amendment also adds power supply units (limited to those using lithium batteries as components), mobile phone devices, and heated tobacco devices to the list of "Specified Resources-Recycled Products" for voluntary collection and recycling. The respective thresholds are 1,000 units for power supply units, 10,000 units for mobile phone devices, and 300,000 units for heated tobacco devices in the business year.

The purpose of designating "Specified Decarbonization Recycled Resources Utilization Promoted Products" is to promote the use of recycled plastics in Japan from the perspective of effective resource utilization and decarbonization. The inclusion of new "Specified Resources-Recycled Products" is intended to expand the collection and recycling of small lithium batteries, as well as to reduce the risk of smoking and fire at recycling and waste disposal sites.

The expected date of enforcement is 1 April 2026.

Changes to classification of chemicals standards and to GHS-Labeling and safety data sheets standards (consultation)

The Japanese Industrial Standards Committee is consulting on proposed changes to standards JISZ7252, Classification of chemicals based on "Globally Harmonized System of Classification and Labeling of Chemicals (GHS)", and JISZ7253, Hazard communication of chemicals based on GHS-Labeling and Safety Data Sheet (SDS). These standards implement the GHS in Japan, and the proposed changes aim to align them with the 9th GHS revision. In the case of JISZ7252, the proposal includes updates to some classification categories, including new non-animal testing methods. For JISZ7253, the proposal includes updates to the statements and additional information on the transport of solids and liquefied gases.

The consultation is open until 9 August 2025. More information can be found in this announcement from the ME.

Saudi Arabia

Amendments to the Labor Law regarding workforce rights (announced)

Effective on 19 February 2025, Saudi Arabia enacted sweeping amendments to its Labor Law, marking the most significant overhaul since 2015. These reforms were driven by the Kingdom's Vision 2030 initiative, which aims to establish new employer obligations and worker protections that will apply across all private-sector industries, including aerospace and defense. Key changes include a mandatory written, fixed-term contract for all non-Saudi employees (defaulting to one year if unspecified), an extended probation period of up to 180 days, leave entitlements, and legally required housing and transport allowances for workers.

The Ministry of Human Resources and Social Development (MHRSD) is also granted expanded authority to enforce labor violations, including the power to issue warnings, impose fines, suspend business activities, and revoke licenses for non-compliance with Saudization quotas (Saudization quotas are scheduled to take effect in phases beginning October 2025), contract requirements, and employee rights. Failure to align with the updated framework could result in administrative penalties and potential disruption to business operations.

Singapore

Controls on nine mercury-added products, long-chain perfluorocarboxylic acids, medium-chain chlorinated paraffins, carbosulfan, fenthion, and chlorpyrifos (published)

The National Environment Agency (NEA) published two updates in June 2025 to introduce control measures on several chemical groups and substances.

NEA/HS/6.6/MEA01, issued on 13 June 2025, introduces controls on two groups of chemicals and nine mercury-added products, designating them as Hazardous Substances in Singapore. The primary aim in introducing these controls is to enhance environmental protection and management by restricting the circulation of these specific hazardous substances and products within Singapore, utilizing the existing frameworks of the Environmental Protection and Management Act 1999 (EPMA) and the Environmental Protection and Management (Hazardous Substances) Regulations (EPM(HS) Regs).

With an effective date of 1 August 2025, companies dealing with the two controlled chemical groups – long-chain perfluorocarboxylic acids (LC-PFCAs) and medium-chain chlorinated paraffins (MC-CPs) – will be required to obtain a hazardous substance (HS) license for their import, export, manufacture, possession for sale, sale, or offer to sell activities. Furthermore, an HS permit will be necessary for storing and using these chemicals, and HS transport approval will be required for their transportation, irrespective of quantity.

For the nine specified mercury-added products, their import, export, and manufacture will be prohibited in Singapore from the same date. However, existing stocks of these mercury-added products that were imported before 1 August 2025 are permitted for local use and sale until they are depleted.

NEA/HS/6.6/MEA02, issued on 19 June 2025, details new control measures for specific chemicals – carbosulfan (CAS No. 55285-14-8), fenthion (CAS No. 55-38-9), chlorpyrifos (CAS No. 2921-88-2), MCCPs, and LC-PFCAs. The aim with this update is to align Singapore's chemical controls with recent decisions adopted at the 12th meeting of the Conference of the Parties (COP-12) of the Rotterdam and Stockholm Conventions, which took place from 28 April to 9 May 2025. As a result, with effect from 22 October 2025:

- the import and export of carbosulfan and fenthion formulations (specifically ultra-low-volume formulations ≥ 640 grams active ingredient/liter for fenthion) will be subject to the Prior Informed Consent (i.e., PIC) procedure of the Rotterdam Convention; this means prior approval from the Chemical Control and Management Department of NEA will be required for every export of these chemicals
- for chlorpyrifos, MCCPs (with chlorination levels ≥ 45% chlorine by weight), and LC-PFCAs, which have been listed in Annex A of the Stockholm Convention for elimination of their production and use, the official phase-out date has not yet been finalized

The NEA has stated it will continue to engage with industry stakeholders and provide further updates on the official phase-out date and specific control measures for these chemicals in Singapore.

There are no penalties specified within these notices.

South Korea

Designation of accident preparedness materials (draft)

South Korea's National Institute of Chemical Safety has published a draft amendment (can also be found here in Korean) to the Designation of Korean Accident-Preparedness Chemicals, proposing the listing of the following chemicals:

- xylene (CAS No. 1330-20-7) and mixtures containing 85% or more thereof
- styrene (CAS No. 100-42-5), ethylbenzene (CAS No. 100-41-4); vinylbenzene (CAS No. 100-42-5) and mixtures containing 25% or more thereof
- 1,3-butadiene (CAS No. 106-99-0) and mixtures containing 25% or more thereof

These substances have been proposed as they pose a serious risk and if there is a high possibility of an accident occurring or a chemical accident occurs, the damage is expected to be large. The substances listed are subject to additional controls and regulatory requirements.

Taiwan

Amendments to regulation on hydrochlorofluorocarbons (announced)

Taiwan's Ministry of Environment (MOENV) has proposed amendments to its regulation on hydrochlorofluorocarbons (HCFCs), reaffirming the goal to phase out both production and consumption of these ozone-depleting substances by 1 January 2030. The regulation has been renamed from the "Measures for the Administration of Hydrochlorofluorocarbon Consumption" to "Measures for the Administration of Hydrochlorofluorocarbons" to reflect a broader scope.

This update aligns Taiwan's national regulations with the Montreal Protocol's strengthened requirements on ozone-depleting substances management and phase-out schedules. The aim of the amendments is to ensure effective control and elimination of HCFCs in line with international environmental commitments.

The updated regulation strengthens control measures on the production, import, export, use, and disposal of HCFCs. It sets clear deadlines for the complete phase-out of HCFC production and consumption by 1 January 2030. The revised regulation broadens the administrative scope beyond consumption to also regulate production and overall management. Companies involved in the manufacturing, importing, or distributing of HCFCs must comply with stricter reporting and registration requirements. Entities are required to follow environmentally sound management practices for HCFC handling and disposal to minimize ozone layer damage. This update impacts manufacturers, importers, and users of HCFCs in Taiwan by requiring stricter compliance with phase-out timelines and enhanced oversight to prevent illegal trade or use.

The phase-out deadline is set for 1 January 2030. Specific enforcement dates and transitional provisions will be provided by MOENV in the future.

Penalties for non-compliance have not been specified. More information can be found here in Chinese.

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Vietnam

Amendments to regulations on greenhouse gas emissions (published)

Decree 119/2025/ND-CP (can also be found here in Vietnamese), serves as a final amendment to Decree No. 06/2022/ND-CP. Its primary purpose is to establish carbon market mechanisms and refine the management of controlled substances within Vietnam, further supporting greenhouse gas emission reduction and ozone layer protection. Decree No. 06/2022/ND-CP, issued on 7 January 2022, already regulated greenhouse gas emission reduction and ozone layer protection. Decree 119/2025/ND-CP outlines a comprehensive framework for a domestic carbon market, including the allocation, trading, borrowing, and offsetting of greenhouse gas emission quotas and carbon credits.

The amendment introduces more detailed provisions to strengthen the existing framework, for monitoring, reporting, and appraising emissions at both grassroots and national levels, while establishing a National Registration System for managing these credits and quotas. It also addresses the management, import, and phase-out of ozone-depleting substances and controlled greenhouse gases, aligning national policies with international commitments under the Paris Agreement and Montreal Protocol. The Decree amends and supplements various Articles of Decree No. 06/2022/ND-CP and includes several appendices that provide specific forms and lists to support its implementation.

Decree 119/2025/ND-CP entered into force on 1 August 2025. Failure to fully repay greenhouse gas emission quotas will result in administrative penalties under environmental protection laws, and the unpaid quota amount will be deducted from the facility's allocated quota for the next period.

EUROPE

European Union

Highlights from the June 2025 meetings of Committees for Risk Assessment and Socio-Economic Analysis of the European Chemicals Agency (published)

On 18 June 2025, the European Chemicals Agency published outcomes from the June 2025 meetings of its Committees for Risk Assessment (RAC) and Socio-Economic Analysis (SEAC). The committees progressed their assessment of the proposed European Union-wide restriction on per- and polyfluoroalkyl substances (PFAS), including provisional conclusions for lubricant uses. Further evaluation is planned for September 2025, focusing on PFAS applications in electronics and semiconductors, PFAS manufacturing, lubricants, and horizontal issues such as enforceability, analytical methods, and concentration thresholds.

RAC adopted a scientific opinion recommending an occupational exposure limit (OEL) of 24 µg/m³ for bisphenol A (BPA; EC No. 201-245-8; CAS No. 80-06-7) to protect against fertility-related effects. It also recommended adding legislative provisions to safeguard unborn and breastfed children from BPA exposure. RAC further noted that this OEL may not be adequately protective against other bisphenols, including bisphenol S (EC No. 201-250-5; CAS No. 80-09-1), bisphenol F (EC No. 201-658-2; CAS No. 620-92-8), and bisphenol AF (EC No. 216-036-7; CAS No. 1478-61-1).

In addition, RAC and SEAC confirmed that the restriction proposal for certain chromium (VI) substances meets REACH Annex XV requirements. A six-month public consultation on this proposal began on 18 June 2025.

The RAC also adopted ten opinions on harmonized classification and labeling, including for substances such as talc (EC No. 238-877-9; CAS No. 14807-96-6) and burgeonal (EC No. not available; CAS No. 18127-01-0). Publication delays were noted due to committee workload. Finally, RAC and SEAC adopted three opinions on applications for authorization and agreed on eighteen additional draft opinions.

Short-term relief for large companies subject to Corporate Sustainability Reporting Directive (published)

On 11 July 2025, the European Commission adopted a targeted amendment ("quick fix") to the first set of European Sustainability Reporting Standards (ESRS), offering short-term relief to large companies already subject to the Corporate Sustainability Reporting Directive (CSRD). Specifically, companies with more than 750 employees—referred to as "wave-one" reporters—may now omit forward-looking disclosures regarding the financial impacts of sustainability risks and opportunities for financial years 2025 and 2026. This adjustment aligns their disclosure obligations with those of smaller entities, effectively deferring certain complex reporting requirements without altering the broader CSRD timeline or applicability.

The delegated act does not modify the existing enforcement mechanisms under national laws. Therefore, while this amendment may ease short-term reporting burdens, companies should continue aligning their reporting frameworks with CSRD requirements in preparation for full implementation by 2027.

Amendment to Annex I to Regulation (EU) 2019/1021 regarding perfluorooctanoic acid, its salts, and related compounds (announced)

On 5 May 2025, the European Commission adopted Commission Delegated Regulation (EU) 2025/1399, amending Annex I of Regulation (EU) 2019/1021 (i.e., POPs[1] Regulation) concerning perfluorooctanoic acid (PFOA; CAS No. 335-67-1), its salts, and related compounds. This update extends the exemption for using PFOA in firefighting foams and adjusts the unintentional trace contaminant (UTC) limits, addressing implementation difficulties reported by Member States and stakeholders. The amendment aligns with the Stockholm Convention and continues the European Union's (EU's) efforts to eliminate POPs while supporting practical transition timelines.

The update amends Annex I, Part A, of Regulation (EU) 2019/1021. Key changes include:

- updated point (v) of the first column (definition alignment for PFOS)
- modifications and additions to the fourth column of the PFOA entry, including new points 4a, 4b, 6, and 11

The amendment introduces revised UTC limits for firefighting foams containing PFOA and its related substances. For existing firefighting systems used for Class B fires, a temporary limit of 1 milligram per kilogram (mg/kg) for PFOA or its salts and 10 mg/kg for individual or combined PFOA-related compounds applies until 3 August 2028. For fluorine-free foams installed after cleaning systems previously containing PFOA, a limit of 10 mg/kg is set for the combined concentration of PFOA, its salts, and related compounds, acknowledging residual contamination risks.

[1] Persistent organic pollutants

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The exemption for using PFOA in firefighting foams has been extended from 4 July 2025 to 3 December 2025, providing additional time for operators facing challenges in substitution and measurement. A clear definition of "firefighting foam" has also been added to include mixtures, concentrates, and solutions used to generate foam.

Additionally, the regulation now allows continued use of articles containing PFOA that were already in use before the exemption expiry date. Review obligations related to certain medical devices and intermediate uses have been removed due to a lack of new data.

Overall, companies managing firefighting systems must now adhere to these clarified and time-limited thresholds and transition requirements. The new UTC limits for existing systems will apply until 3 August 2028. Penalties for non-compliance have not been specified.

Regulation to harmonize methodology for calculation and verification of rates for recycling efficiency and recovery of materials from waste batteries (published)

On 4 July 2025, the European Commission published Commission Delegated Regulation (EU) 2025/606 to establish a harmonized methodology for calculating and verifying recycling efficiency and material recovery rates for waste batteries. This regulation supplements Regulation (EU) 2023/1542 and supports the creation of a consistent European Union (EU)-wide framework for battery lifecycle management.

The regulation applies to lead-acid, lithium-based, nickel-cadmium, and other battery types, with targeted materials including cobalt, copper, lead, lithium, and nickel, and cadmium in the case of nickel-cadmium batteries. The Annex provides detailed definitions, formulas, and documentation formats for calculating the recycling efficiency and material recovery rate. First recyclers are responsible for annually submitting data, broken down by the collection Member State, to national authorities in the treatment country. Authorities must verify completeness and accuracy, including extra EU recycling.

Documentation requirements vary by battery chemistry and include specific reporting on hazardous substances such as mercury and cadmium. Verification may be conducted through audits, evidence reviews, or third-party assessments. Penalties are not mentioned in the update.

Three substances included in the Candidate List: decamethyltetrasiloxane; 1,1,1,3,5,5,5-heptamethyl-3-[(trimethylsilyl)oxy]trisiloxane; and Reactive Brown 51 (published)

On 25 June 2025, three substances were included in the Candidate List of substances of very high concern (SVHC) for Authorization. The European Chemicals Agency (ECHA) received three Annex XV dossiers for substances from Member States that in their opinion meet the criteria of SVHCs set out in Article 57 of the EU REACH Regulation (EC) No 1907/2006.

The Candidate List is the list of substances that have been identified as SVHCs through the regulatory process within REACH. The presence of a substance on the Candidate List triggers immediate supply chain communication obligations for article suppliers under Article 33 of REACH, as well as possible additional notification obligations for importers and producers of articles under Article 7(2) of REACH. The presence of a substance on the Candidate List means that it will be considered for Authorization.

The Member State Committee at its 90th meeting unanimously agreed that the following substances meet the criteria set out in Article 57:

- decamethyltetrasiloxane (EC No. not available; CAS No. 141-62-8)
- 1,1,1,3,5,5,5-heptamethyl-3-[(trimethylsilyl)oxy]trisiloxane (EC No. 241-867-7; CAS No. 17928-28-8)

These substances have been included due to their very high persistence and very high bioaccumulation (vPvB) properties (Article 57e).

Additionally, the RAC adopted its opinion on the proposal for CLH of Reactive Brown 51 (EC No. 466-490-7; CAS No. not available) as Repr.1B (H360F 'May damage fertility') by consensus. Reactive Brown 51 has therefore been included because of its toxic for reproduction properties (Article 57c).

Regulation to implement the Digital Waste Shipment System (adopted)

On 2 July 2025, the European Commission adopted a regulation implementing the Digital Waste Shipment System (DIWASS), transitioning cross-border waste shipment procedures across the European Union (EU) from paper to fully digital formats. Under the new Waste Shipment Regulation—which entered into force on 20 May 2024—DIWASS becomes mandatory for all intra-EU shipments of both prior-notified and green-listed waste from 21 May 2026. This system aims to improve administrative efficiency, traceability, and environmental compliance, and will also support voluntary use by non-EU countries when they are involved in shipments. Preparatory steps include the publication of technical documentation and user guides by the end of 2025, along with training sessions for national authorities to ensure readiness for the May 2026 deadline.

There are currently no specific penalties for non-compliance outlined in this regulation, however further additional penalties/sanctions may be forthcoming as Member States are required to establish effective, proportionate, and dissuasive sanctions for cases of failure to use DIWASS or improper handling of regulated waste. Additionally, Further provisions concerning exports to non-EU (non-OECD[2]) countries will come into force from 21 May 2027, with new controls on green-listed waste exports unless importing countries are certified as capable of environmentally sound waste management.

Regulation (EU) 2025/718 regarding perfluorooctane sulfonic acid and its derivatives (published)

The European Commission has adopted Commission Delegated Regulation (EU) 2025/718, which amends Regulation (EU) 2019/1021 on persistent organic pollutants (POPs) regarding perfluorooctane sulfonic acid (PFOS; EC No. 260-375-3; CAS No. 1763-23-1) and its derivatives. This update aligns PFOS restrictions with stricter thresholds already established for similar substances (such as PFOA) under the same regulation. Regulation (EU) 2019/1021 implements the European Union (EU) obligations under the Stockholm Convention on POPs and aims to protect human health and the environment by restricting the production and use of persistent organic pollutants. The amendment modifies Annex I of Regulation (EU) 2019/1021.

The update introduces several key changes:

- the entry for PFOS in Annex I is updated to clarify that it includes PFOS, its salts, and PFOS-related compounds, harmonizing wording with PFOA entries

[2] i.e., Organization for Economic Co-operation and Development

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- the concentration limits for unintentional trace contamination are tightened:
  - PFOS or its salts must not exceed 0.025 milligram per kilogram (mg/kg) in substances, mixtures, or articles
  - the sum of all PFOS-related compounds must not exceed 1 mg/kg

The specific exemption allowing PFOS use as a mist suppressant in non-decorative hard chromium VI plating has been removed, as Member State data confirms it is no longer needed. Companies using or importing articles containing PFOS must ensure compliance with these stricter limits. Industries that previously relied on exemptions must fully substitute PFOS.

This regulation enters into force on 17 July 2025. Points 2 and 3 of the Annex will apply from 3 December 2025, allowing time for industry adjustments.

Penalties for non-compliance have not been specified in the amendment.

Guidance on establishing concentration limits for carcinogenic substances under the Classification, Labeling, and Packaging Regulation (draft)

The European Chemicals Agency (ECHA) has developed new draft guidance on establishing specific concentration limits (SCLs) for carcinogenic substances under the Classification, Labeling, and Packaging (CLP) Regulation. This follows a five-year evaluation by a European Union (EU) expert group dedicated to improving carcinogenicity classification practices. The update aims to enhance accuracy and consistency in hazard classification for carcinogens. The draft guidance includes a new Annex IV focused exclusively on setting SCLs for carcinogenicity. This annex is part of a wider planned revision of the CLP guidance document on health hazard criteria application.

The expert group, coordinated by ECHA, recommends applying the benchmark dose methodology to determine carcinogenic potency and classify substances accordingly. New potency ranges for carcinogen classification have been proposed to replace or supplement existing approaches, improving scientific rigor and regulatory consistency. These changes will affect how carcinogenic hazards are assessed and classified in safety data sheets, labels, and notifications under CLP.

The draft guidance, including Annex IV, will undergo review by ECHA's partner expert group before finalization. No specific entry-into-force date is provided yet, and penalties are governed by existing CLP enforcement mechanisms.

Extension of the Carbon Boarder Adjustment Mechanism to downstream products, and other changes (consultation)

On 1 July 2025, the European Commission (EC) launched a public consultation on extending the Carbon Border Adjustment Mechanism (CBAM) to include certain downstream products, introduce anti-circumvention measures, and revise rules for electricity emissions reporting. The consultation seeks stakeholder input on broadening the CBAM scope beyond current core goods like steel, aluminum, cement, fertilizers, hydrogen, and electricity, to cover value-chain products where carbon leakage might still occur. It also examines updating default emission values and allowing electricity producers to report actual emissions under CBAM. Feedback is invited from companies, associations, non-government organizations, researchers, public authorities, and trade unions until 26 August 2025.

Since it is a public consultation, no immediate deadlines or enforcement measures apply. However, the consultation signals the EC's intent to strengthen CBAM's transparency and effectiveness in preventing carbon leakage.

Amendment to the European Union Climate Law to set a 2040 target for greenhouse gas emissions (proposed)

On 2 July 2025, the European Commission proposed a legally binding amendment to the European Union (EU) Climate Law, setting a target of reducing net greenhouse gas emissions by 90 % by 2040 compared to 1990 levels. This builds on existing targets of 55 % by 2030 and climate neutrality by 2050. The proposal introduces flexibility mechanisms—including allowing up to 3 % of the 2040 target to be met through high-quality international carbon credits (starting around 2036) and the use of domestic carbon removals via the EU Trading System—to balance economic and geopolitical realities and foster industrial and energy security. The amendment is now under negotiation in the European Parliament and Council before becoming law. No specific penalties or enforcement dates are outlined; instead, the amendment establishes the 2040 target as a legal milestone and lays the groundwork for future sectoral regulations and investment incentives.

Updates for seventeen substances in the registry of harmonized classification and labeling intentions (announced)

The European Chemicals Agency (ECHA) has published updates for seventeen substances in the registry of harmonized classification and labeling (CLH) intentions under the Classification, Labeling, and Packaging (CLP) Regulation. If the proposed harmonized classifications in these intentions are approved, new packaging and labeling requirements might apply.

Germany submitted a dossier for 1. 1,2,3,6-tetrahydromethyl-3,6-methanophthalic anhydride (EC No. 246-644-8; CAS No. 25134-21-8) with the following proposed harmonized classification:

- Acute Tox. 4, H302
- Acute Tox. 3, H331
- Skin Irrit. 2, H315
- Eye Dam. 1, H318
- Resp. Sens. 1, H334
- Skin Sens. 1, H31

Germany submitted a dossier for 2. 4-chloroformylphthalic anhydride (EC No. 214-874-8; CAS No. 1204-28-0) with the following proposed harmonized classification:

- Skin Corr. 1, H314
- Eye Dam. 1, H318
- Resp. Sens. 1, H334
- Skin Sens. 1, H317
- STOT SE 3, H335

Germany submitted a dossier for tetrabromophthalic anhydride (EC No. 211-185-4; CAS No. 632-79-1) with the following proposed harmonized classification:

- Resp. Sens. 1, H334
- Skin Sens. 1, H317

Sweden submitted a dossier for pendimethalin (ISO); N-(1-ethylpropyl)-2,6-dinitro-3,4-xylidene (EC No. 254-938-2; CAS No. 40487-42-1) with the following proposed harmonized classification:

- Repr. 2, H361d
- Aquatic Acute 1, H400
- Aquatic Acute 1, M-factor = 100
- Aquatic Chronic 1, H410
- Aquatic Chronic 1, M-factor = 10
- PBT, EUH440

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Germany submitted a dossier for 4,4' -Sulfonyldiphthalic acid dianhydride (EC No. 807-101-6; CAS No. 2540-99-0) with the proposed harmonized classification: Resp. Sens. 1, H334.

France submitted a dossier for vanadium tetrachloride; vanadium trichloride oxide; ammonium trioxovanadate; sodium metavanadate; potassium vanadium trioxide; Vanadate(1-), oxo[phosphato(3-)-kO]-, hydrogen, hydrate (2:1) (EC and CAS Nos. not available) with the following proposed harmonized classification:

- Germ cell mutagenicity
- Carcinogenicity
- Reproductive toxicity
- Specific target organ toxicity - repeated exposure
- To be further specified

Spain submitted a dossier for 2,4,8,10-tetra(tert-butyl)-6-hydroxy-12H-dibenzo[d,g][1,3,2]dioxaphosphocin 6-oxide, sodium salt; 2,4,8,10-tetra(tert-butyl)-6-hydroxy-12H-dibenzo-[d,g][1,3,2]dioxaphosphocin 6-oxide, lithium salt; hydroxy aluminum bis(2,4,8,10-tetra-tert-butyl-6-hydroxy-12H-dibenzo[d,g][1.3.2]dioxaphosphocin-6-oxide); 2,4,8,10-tetra(tert-butyl)-6-hydroxy-12H-dibenzo[d,g][1,3,2]dioxaphosphocin 6-oxide (EC and CAS Nos. not available) with the proposed harmonized classification: Repr. 1B, H360F.

Germany submitted a dossier for 4,4'-biphthalic dianhydride (EC No. 219-342-9; CAS No. 2420-87-3) with the proposed harmonized classification: Resp. Sens. 1, H334.

Germany submitted a dossier for 4,4'-oxydiphthalic anhydride (EC No. 412-830-4; CAS No. 1823-59-2) with the following proposed harmonized classification:

- Resp. Sens. 1, H334
- Aquatic Chronic 3, H412

Germany submitted a dossier for benzophenone-3,3':4,4'-tetracarboxylic dianhydride (EC No. 219-348-1; CAS No. 2421-28-5) with the following proposed harmonized classification:

- Eye Irrit. 2, H319
- Resp. Sens. 1, H334
- STOT SE 3, H335
- Reproductive toxicity
- Hazardous to the aquatic environment

Sweden, in collaboration with Norway, submitted a dossier for dichloro(dimethyl)silane (EC No. 200-901-0; CAS No. 75-78-5) with the following proposed harmonized classification:

- Reproductive toxicity
- Persistent, mobile, toxic / very persistent, very mobile

Germany submitted a dossier for ethylene bis[1,3-dihydro-1,3-dioxoisobenzofuran-5-carboxylate] (EC No. 217-062-1; CAS No. 1732-96-3) with the following proposed harmonized classification:

- Eye Dam. 1, H318
- Skin Sens. 1B, H317

Austria submitted a dossier for potassium chlorate (EC No. 223-289-7; CAS No. 3811-04-9) with the following proposed harmonized classification:

- Ox. Sol. 1, H271
- Acute Tox. 3, H301
- Endocrine disruptor for human health
- Oral ATE = 100 mg/kg by weight

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Belgium submitted a dossier for propyl 4-hydroxybenzoate (EC No. 202-307-7; CAS No. 94-13-3) with the following proposed harmonized classification (consultation open until 22 August 2025):

- ED ENV 1, EUH430
- Aquatic Chronic 3, H412

Hungary withdrew a dossier for octahydro-1,3,5,7-tetranitro-1,3,5,7-tetrazocine (EC No. 220-260-0; CAS No. 2691-41-0) with the following proposed harmonized classification:

- Explosive
- Acute toxicity
- Skin corrosion/irritation
- Serious eye damage/eye irritation
- Carcinogenicity
- Reproductive toxicity
- Specific target organ toxicity - single exposure
- Specific target organ toxicity - repeated exposure

Hungary withdrew a dossier for perhydro-1,3,5-trinitro-1,3,5-triazine (EC No. 204-500-1; CAS No. 121-82-4) with the following proposed harmonized classification:

- Explosive
- Acute toxicity
- Skin corrosion/irritation
- Serious eye damage/eye irritation
- Carcinogenicity
- Reproductive toxicity
- Specific target organ toxicity - single exposure
- Specific target organ toxicity - repeated exposure

Austria withdrew a dossier for sulphamidic acid (EC No. 226-218-8; CAS No. 5329-14-6) with the following proposed harmonized classification:

- Skin Irrit. 2, H315
- Eye Irrit. 2, H319

Restrictions for certain chromium VI oxides, oxyacids, and salts (consultation)

The European Chemicals Agency is consulting on a proposal to restrict certain chromium VI oxides, oxyacids, and salts under Annex XVII to REACH (comments due on 18 August 2025). The proposed restriction would apply to thirteen chromium substances and would prohibit the use of these substances on their own or in a mixture at a concentration equal or greater than 0.01 % by weight. Derogations to this prohibition would apply to their use as intermediates and in cases where site-specific releases are below emission limit values. There are two different emission limit values proposals for this derogation.

Addition of bis(2-ethylhexyl) tetrabromophthalate, covering any of the individual isomers and/or combinations thereof, to the Stockholm Convention (consultation)

The European Chemicals Agency has opened a consultation on a proposal to add bis(2-ethylhexyl) tetrabromophthalate (EC No. 247-426-5, CAS No. 26040-51-7) covering any of the individual isomers and/or combinations thereof (TBPH) to the Stockholm Convention. Comments were due on 13 August 2025. The Stockholm Convention regulates persistent organic pollutants (POPs) on a global scale; this convention is implemented in the European Union (EU) through Regulation (EU) 2019/1021.

As a party to the Stockholm Convention, the EU can propose new additions to the list of restricted substances. TBPH is a flame retardant which has been shown to fulfill the criteria for persistence, bioaccumulation, long-range transport and

adverse effects to be listed under the Convention. Therefore, the EU has prepared a proposal to list this substance under the Convention. If this proposal is accepted, any relevant restrictions will apply in the EU and in the other Parties to the Convention.

List of products, components, and waste streams with a high potential to recover critical raw materials (consultation)

The European Commission opened a consultation on a draft regulation listing the products, components, and waste streams considered to have critical raw materials recovery potential under Regulation (EU) 2024/1252. Comments were due on 25 July 2025. Regulation (EU) 2024/1252 establishes a framework for ensuring a secure and sustainable supply of critical raw materials.

The draft regulation lists the products, components, and waste streams under its Annex as required by Article 26(7) of Regulation (EU) 2024/1252. This list will serve as a reference for the scope of the national measures that Member States must take to enforce Regulation (EU) 2024/1252. The list is divided into categories, including batteries, electric and electronic equipment, motor vehicles, construction and demolition waste, and others.

Proposals to digitalize product compliance obligations and uniformly align the use of common specifications (intention)

On 14 July 2025, the European Union (EU) introduced two proposals (G/TBT/N/EU/1144 & G/TBT/N/EU/1145) to digitalize product compliance obligations and uniformly align the use of common specifications. This initiative, rooted in the "digital by default" principle, aims to reduce administrative burdens by 25% for economic operators, particularly SMEs, by shifting from paper to electronic processes and capitalizing on high internet access in EU households.

Key requirements for economic operators include preparing EU declarations of conformity in electronic form, adding a "digital contact" on products, and providing instructions primarily in digital form. However, safety information must still be on paper or directly on the product for consumers, who also retain the right to request a paper copy. Furthermore, all reporting to national authorities will become exclusively electronic, and a new provision allows common specifications to presume conformity in the absence of harmonized standards.

Comments on the two proposals are due by 12 October 2025. Proposed adoption is set for 2026, and they are expected to enter into force 20 days after publication in the Official Journal of the EU.

Call for Evidence for the New Legislative Framework (announced)

On 14 July 2025, the European Commission (EC) launched a Call for Evidence for the revision of the New Legislative Framework (NLF), established in 2008 as the foundation for harmonized EU product legislation. This initiative follows a 2022 evaluation, which highlighted the need to modernize the NLF considering digitalization, circular economy objectives, and new market realities. The revision aims to update and streamline the product compliance framework by integrating digital solutions (including the Digital Product Passport), enhancing the effectiveness of notified conformity assessment bodies, and aligning with recent legislative developments such as the Batteries Regulation.

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Key policy options under consideration include:

- maintaining the baseline, with current legislation setting out digital product compliance requirements, but risking inconsistencies and fragmentation without a comprehensive update
- non-legislative measures, such as guidelines and best practices to support SMEs with digital tools and compliance
- legislative changes, ranging from targeted amendments to broad revisions, which could include mandatory Digital Product Passports, updated conformity assessment processes, clarified definitions, and improved oversight of notified bodies

The primary objectives are to reduce regulatory burdens, ensure legal certainty for consumers, promote transparency, and foster a fairer, more competitive single market. Positive impacts are expected for businesses, especially SMEs, through lower compliance costs and streamlined processes.

The EC seeks input from Member State authorities, manufacturers (including SMEs), industry associations, re-furbishers, conformity assessment bodies, consumers, civil society, and academia. The public consultation will be open for at least 12 weeks, and all official European Union languages are supported.

Amendments to the Classification, Labeling, and Packaging Regulation to simplify and modernize requirements and procedures for chemical products (proposal)

On 8 July 2025, the European Commission (EC) published a proposal to simplify and modernize requirements and procedures for chemical products by amending the Classification, Labeling, and Packaging (CLP) Regulation (EC 1272/2008).[3] The CLP Regulation aligns the classification, labeling, and packaging of hazardous chemicals with the United Nations' Globally Harmonized System (GHS) and ensures safe communication of chemical hazards across the European Union.

The proposal includes the following:

- prescriptive formatting requirements for hazard labeling, such as fixed font sizes and spacing, are removed and instead labels are required to be clearly legible
- the requirement for a supplier's address and telephone number on the label is replaced with a mandatory "digital contact," defined as any up-to-date and accessible online channel that does not require registration or downloading an application
- labeling exemptions for small packages, defined as those less than 10 milliliters, are expanded and the need to prove the impossibility of full labeling is removed
- digital labeling options are broadened, enabling additional supplier details and supplemental information to be included exclusively on the digital label
- the fixed six-month deadline for label updates is replaced by a requirement to update labels "without undue delay."
- fuel pump labeling requirements are clarified and streamlined
- advertising requirements for hazardous chemicals are limited to the public and are reduced to a single mandatory statement: "Always read the label and product information before use"

Transitional provisions allow continued sale of products placed on the market before the new rules apply. The EC estimates the cost savings from labeling simplification to be at least €333 million.

[3] The proposal also amends the Cosmetic Products Regulation (EC 1223/2009) and the Fertilizing Products Regulation (EU 2019/1009), which are not discussed herein as they are not relevant to the Aerospace and Defense industry.

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The amendments target a 25 percent reduction in administrative costs, with a 35 percent target for small business enterprises. They support digital transformation through a "digital by default" approach and aim to improve regulatory clarity and foster innovation in the chemicals sector. Additional environmental benefits may arise from reduced packaging and paper waste.

Finland

Updates to the Environmental Protection Act regarding the environmental governance framework and the environmental permitting and enforcement procedures (published)

On 11 July 2025 and 14 July 2025, the Ministry of Environment published an amendment to The Environmental Protection Act Regulation 527/2014 through Finnish legislation. The Finnish Environmental Protection Act aims to prevent and reduce environmental pollution, safeguard human health and the environment, and promote sustainable use of natural resources. It sets out the legal framework for environmental permits, emissions control, and the responsibilities of operators and authorities in managing environmentally impactful activities in Finland.

The first update (here in Finnish) – the "Act on Amendments to the Environmental Protection Act (817/2025)" – introduces several regulatory updates aimed at improving Finland's environmental governance framework. The amendment clarifies and enhances the roles of supervisory authorities, particularly in situations where environmental damage or regulatory violations occur. It strengthens administrative enforcement powers, allowing authorities to issue orders and prohibitions with immediate effect to prevent serious environmental harm or to address breaches of environmental legislation. These orders are enforceable even during ongoing appeals, reflecting a shift towards precautionary enforcement. Additionally, the first update introduces clearer obligations for operators, such as submitting reports, notifying authorities of exceptional situations or environmental threats, and cooperating with inspections. It emphasizes transparency by requiring authorities to publish summaries of permit applications and decisions, fostering public access to environmental information. Overall, the 817/2025 amendment supports more robust environmental protection through enhanced enforcement mechanisms, streamlined responsibilities between agencies, and increased accountability for operators. These updates align with the European Union's (EU's) environmental governance principles and contribute to better compliance and risk management practices across regulated sectors.

The second update (here in Finnish) – the "Act on Amendments to the Environmental Protection Act (824/2025)" – introduces several significant updates aimed at streamlining and clarifying environmental permitting and enforcement procedures in Finland. This update expands the competence of the Licensing and Supervision Agency, designating it as the primary authority for environmental permits that also require a water permit under the Water Act. In such cases, the permitting process will follow the procedures set out in the new Act on the Processing of Certain Environmental Matters by the LVA (823/2025). Permit application and hearing procedures have also been revised. When an application includes an Environmental Impact Assessment, the hearing must now be conducted using the joint procedures outlined in the updated legislation. Additionally, the public comment period for permit applications has been adjusted to a mandatory range of 45 to 60 days to ensure adequate participation and transparency. Also, the amendment clarifies the joint processing of permits governed by the Environmental Protection Act, the Water Act, and the Nature Conservation Act, ensuring consistency and coordination across regulatory frameworks. Provisions have also been added to ensure that when multiple types of permits are required for a project, they can be processed together efficiently. On the legal and enforcement side, environmental permit appeals and certain decisions made by the LVA must now be handled urgently by the Court of Appeal.

The updated Act will enter into force on 1 January 2026, marking a transition to a more integrated and responsive permitting regime in Finland. These changes are part of broader efforts to modernize environmental governance and improve regulatory clarity for operators and authorities alike.

Amendment to Sections 133 and 140 of the Waste Act (published)

On 3 July 2025, Finland published an amendment to the Waste Act (646/2011) through Act 468/2025. The amendment repeals Subsection 4 of Section 133 and revises Section 140 concerning the enforcement of negligence fines. Under the revised provision, the enforcement of fines imposed under the Waste Act is now governed by the Act on the Enforcement of Fines (672/2002). This change clarifies legal procedures for enforcing penalties related to waste management obligations.

More information on the amendment ca be found here in Finnish.

United Kingdom

Extending the UK REACH Transitional Registration Submission deadlines (consultation)

Under the United Kingdom (UK) REACH, businesses are required to register information on chemicals substances that are placed on the GB market. Post-Brexit, information on substances on the GB market which had been registered with UK REACH was not passed to the Health and Safety Executive (HSE). The government is working on a proposal to create a UK REACH alternative transitional registration model (ATRm), which aims to ensure the registration with the HSE of these substances and will specify what these information registration requirements involve.

The existing UK REACH Transitional Registration Submission deadlines were planned for October 2026, October 2028, and October 2030. These deadlines are phased according to the tonnages and hazard profiles of the substances being registered. It will no longer be possible to deliver the legislative changes to implement the ATRm before the current first submission deadline in October 2026. Therefore, it has become necessary to consult on revised transitional submission deadlines, to provide sufficient time for the government to complete the ATRm and for industry to prepare to comply.

The proposed new deadlines under consultation are:

- Option 1: October 2029, October 2030, October 2031
- Option 2: April 2029, April 2031, April 2033
- Option 3: April 2029, April 2030, April 2031

The consultation closes on 8 September 2025. More information can be found in this announcement.

NORTH AMERICA

Canada

Ministerial Condition concerning import and manufacturing of 1-hexene, 3,3,4,4,5,5,6,6,6-nonafluoro- (published)

The Department of the Environment published a Ministerial Notice No. 22186 that outlines the import and manufacturing conditions for 1-hexene, 3,3,4,4,5,5,6,6,6-nonafluoro- (CAS No. 19430-93-4), under the Canadian Environmental Protection Act, 1999 (CEPA). This condition was created because the Minister of the Environment and the Minister of Health have assessed information pertaining to the substance and suspect that it is toxic or capable of becoming toxic within the meaning of section 64 of CEPA.

This condition permits the manufacture or import of the substance imposing several key requirements on the notifier:

- prior notification for manufacturing required at least 120 days prior to manufacturing
- necessary measures for environmental release in the event of any release of the substance to the environment
- maintenance of comprehensive electronic or paper records

There are no penalties specified with this update. The ministerial condition came into force on 17 June 2025.

United States

Withdrawal of Significant New Use Rules for 18 substances derived from plastic waste (published)

On 9 July 2025, the US Environmental Protection Agency (EPA) announced the withdrawal of a proposed rule that would have established Significant New Use Rules (SNURs) for 18 substances derived from plastic waste. These substances had previously been subject to a Toxic Substances Control Act (TSCA) section 5(e) Order, which served as the basis for the original proposal. The proposed SNURs were issued under section 5(a)(2) of TSCA and would have required a 90-day advance notification to EPA before manufacturing (including importing) or processing any of the specified substances for an activity that is a significant new use. The withdrawn SNURs included:

- any manufacturing, processing, use, distribution in commerce, or disposal that does not conform to the restrictions imposed by the underlying TSCA section 5(e) Order
- manufacturing or processing using feedstocks containing any amount of heavy metals (arsenic, cadmium, chromium VI, lead, mercury), dioxins, phthalates, per- and polyfluoroalkyl substances (PFAS), polybrominated diphenyl ethers (PBDEs), alkylphenols, perchlorates, benzophenone, bisphenol A (BPA), organochlorine pesticides (OCPs), ethyl glycol, methyl glycol, or N-methyl-2-pyrrolidone (NMP)

On 7 April 2023, petitioners filed a legal challenge (Cherokee Concerned Citizens v. EPA). Given potential issues with the TSCA section 5(e) Order, EPA sought voluntary remand, which the court granted on 4 December 2024. EPA subsequently withdrew the Order on 18 December 2024. As a result, the proposed SNURs have been withdrawn.

At the time of withdrawal, manufacturing of the substances had not commenced. EPA also noted receipt of 30 public comments, including adverse ones that encouraged the Agency to remand or modify both the TSCA section 5(e) Order and SNURs.

Significant New Use Rules on certain chemical substances previously subject to pre-manufacture notices (published)

The US Environmental Protection Agency (EPA) published a Final Rule outlining Significant New Use Rules (SNURs), issued under the Toxic Substances Control Act (TSCA), pertaining to new chemical substances previously subject to pre-manufacture notices (PMNs). This Final Rule establishes SNURs requiring any person to notify EPA at least 90 days before commencing the manufacture (including import) or processing of any of these chemical substances for an activity designated as a significant new use. Manufacturing or processing for a significant new use cannot begin until EPA has reviewed the notification, made a determination, and taken any necessary actions. The "significant new uses" are broadly defined as any manufacturing, processing, use, distribution in commerce, or disposal that does not conform to the restrictions imposed by the underlying TSCA orders for each specific chemical substance.

This action directly affects manufacturers, processors, and users of the identified chemical substances. Potentially affected industries include chemical manufacturing and petroleum refineries (NAICS codes 325 and 324110). Importers are subject to existing TSCA Section 13 requirements, which mandate certification that chemical substance shipments comply with all applicable TSCA rules and orders, including these new SNURs. Exporters must also comply with TSCA section 12(b) export notification provisions, which require a one-time notice to EPA for the first export or intended export of a SNUR-subject substance to a particular country.

The rules for each specific chemical substance (identified by their PMN number) are detailed individually under Subpart E—Significant New Uses for Specific Chemical Substances within 40 CFR Part 721. Each chemical substance entry specifies the significant new uses subject to reporting, including detailed requirements for protection in the workplace, hazard communication, industrial, commercial, and consumer activities, and release to water or disposal.

This final rule follows proposed SNURs that were published on 11 June 2024, with EPA having considered public comments received during that prior phase. The rule became effective on 12 August 2025.

Release of risk reports for 1,3-Butadiene and 1,1-Dichloroethane and extension of effective provisions for workplace conditions for trichloroethylene (published)

On 12 June 2025, the United States Environmental Protection Agency (EPA) released the meeting minutes and final report from the Science Advisory Committee on Chemicals (SACC) for 1,3-butadiene (CAS No. 106-99-0) (docket EPA-HQ-OPPT-2024-0425), which reviewed the draft 2024 TSCA risk evaluation and a March 2025 supplement refining cancer risk estimates. The committee provided scientific feedback on EPA's preliminary finding of unreasonable risk via inhalation exposure for workers and the general population, and the Agency will use this input to finalize the risk evaluation.

On 20 June 2025, EPA issued its final risk evaluation for 1,1-dichloroethane (CAS No. 75-34-3) under TSCA. The Agency concluded that the chemical presents an unreasonable risk to human health from three worker-related conditions of use, including use as a solvent and in laboratory research. New inhalation monitoring data were considered, though the risk determination does not assume personal protective equipment use. No significant general population or environmental risks were identified. EPA now moves to the risk management phase, with proposed rules required within one year (by June 2026).

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On the same date, EPA extended the postponement of effective provisions for workplace conditions under exempted uses in the final TSCA rule for trichloroethylene (CAS No. 79-01-6) by 60 days, shifting the effective date for TSCA section 6(g) exemption conditions to 19 August 2025. This action maintains the status quo while litigation is pending before the U.S. Court of Appeals for the Third Circuit. EPA also signaled plans to reconsider aspects of the original December 2024 rule through public consultation and future rulemaking.

Penalties are not mentioned in the updates.

Extension of compliance date for amendments to the National Volatile Organic Compound Emission Standards for Aerosol Coatings (consultation)

On 2 July 2025, the US Environmental Protection Agency (EPA) published an interim final rule under the Clean Air Act (CAA) to extend the compliance date for recent amendments to the National Volatile Organic Compound (VOC) Emission Standards for Aerosol Coatings. The compliance deadline, originally set for 17 July 2025, is now postponed to 17 January 2027. This extension follows petitions from affected industry stakeholders.

The aerosol coatings rule, first introduced in 2008 and codified at 40 CFR Part 59 Subpart E, sets VOC reactivity-based limits for aerosol coating products. Amendments finalized on 17 January 2025 aimed to harmonize federal requirements with California's Air Resources Board regulations. However, subsequent industry feedback indicated that the timeline was insufficient to allow for product reformulation, re-labeling, and supply chain adjustments. Petitions were submitted by the American Coatings Association, the Coalition for Fair Aerosol Regulation, and Diamond Vogel requesting the need for more lead time. In response, EPA granted reconsideration and delayed the compliance date accordingly.

EPA issued the rule as an interim final rule, effective immediately, citing good cause under the Administrative Procedure Act due to the imminence of the original compliance date. The extension is expected to reduce burden and avoid inadvertent non-compliance. Comments on the revised compliance timeline were due on 1 August 2025.

SOUTH AMERICA

Peru

Decree No. 007-2025-SA to regulate lead content in paints and other coating materials (published)

Decree No 007-2025-SA (here in Spanish), was issued on 3 June 2025 by the Peruvian government to regulate lead content in paints and other coating materials. The decree aims to protect public health by imposing strict limits on lead content, requiring specific authorizations and registrations, mandating detailed labeling, and establishing a framework for waste management and rigorous fiscalization. The core requirement is that paints and other coating materials manufactured, imported, distributed, and/or commercialized in Peru cannot contain lead exceeding 90 milligrams per kilograms of the total non-volatile content of the paint or the dry paint film weight.

The concentration of lead must be determined using Peruvian Technical Standards (NTP 319.622:2021, NTP 319.606:2018) or international standards like ASTM E1613-12, or equivalent updated norms. The Decree also establishes comprehensive administrative procedures for obtaining, renewing, and modifying sanitary authorizations.

The Decree comes into force on 4 December 2025, with the following compliance timelines indicated:

- paints and other coating materials for architectural, decorative, and domestic applications already on the market have twelve months from the Decree's entry into force (approximately 4 December 2026) to comply with its provisions
- paints and other coating materials for industrial applications already on the market have eighteen months from the Decree's entry into force (approximately 4 June 2027) to comply with its provisions

Sanctions for non-compliance, range from minor penalties to severe fines up to 100 Tax Units and business closure.

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