Newsletter

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

IAEG

Vol.5, Issue 9

NEWSLETTER

Global Chemical, Environmental, Social, and Governance Regulations, Policies, and Standards
Issue 9 – 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 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

The International Organization for Standardization and the Greenhouse Gas Protocol announce strategic partnership to deliver unified global standards for greenhouse gas emissions accounting (consultation)

On 9 September 9 2025, the International Organization for Standardization (ISO) and the Greenhouse Gas (GHG) Protocol announced a strategic partnership to harmonize their respective standards and co-develop unified global frameworks for greenhouse gas emissions accounting and reporting. This collaboration aims to streamline carbon accounting by integrating ISO's 1406X series with GHG Protocol's Corporate Accounting, Scope 2, and Scope 3 Standards. The initiative will also introduce a joint product carbon footprint standard, enabling companies to access more granular emissions data across their value chains. This development marks a significant milestone in alignment of climate-related standards and lays the groundwork for future regulatory alignment and simplification of reporting burdens. These standards remain voluntary until adopted by regulators, customers, or contractual requirements.

ASIA

China

Addition of four substances to the Inventory of Existing Chemical Substances in China (consultation)

On 11 August 2025, the Ministry of Ecology and Environment (MEE) announced a public consultation on the second batch of 2025 (14th batch overall) of chemicals proposed for inclusion in the Inventory of Existing Chemical Substances in China (IECSC). MEE reviewed applications submitted by relevant entities and found four substances met the requirements of the Environmental Management of New Chemical Substances Regulation (MEE Order No. 12) and its guidelines. The notice proposes the following four substances for inclusion in the IECSC:

- cyclohexylvinyl ether (CAS No. 2182-55-0)
- ethoxylated trimethylolpropane trimethacrylate (CAS No. 82727-34-2)
- 1,3-butylene glycol diesters with decanoic acid and octanoic acid (CAS No. 211107-84-5)
- fatty acids, C14-20, cobalt (2+) salts (CAS No. 3065587-79-0)

The consultation period, which ran from August 11 to 22, 2025, has now closed. MEE will review submissions received during the consultation before finalizing the update to the IECSC.

More information can be found here in Chinese.

Second draft of the Hazardous Chemicals Safety Law (consultation)

The Standing Committee of the 14th National People's Congress has published the second draft for the Hazardous Chemicals Safety Law of the People's Republic of China (the Law). Comments on the draft were due on 11 October 2025. The Law aims to further strengthen the management of hazardous chemicals in China. Some of the key points are:

- an increase in training and safety requirements for both the chemical industry and other users of hazardous chemicals, like research institutes, medical facilities, testing facilities, etc.
- establishment of a national hazardous chemicals catalogue management system
- requirements for the correct labeling of hazardous chemicals, including SDS requirements
- classification of chemicals and the prohibition of use of chemicals with unknown classification
- stricter safety requirements for the transport of hazardous chemicals

More information can be found here in Chinese.

Ban on the production of household refrigerators and freezers using hydrofluorocarbons (draft)

The Ministry of Ecology and Environment (MEE) announced its plans to prohibit the production of household refrigerators and freezers that use hydrofluorocarbons (HFCs) as refrigerants starting from 1 January 2026. This measure is a key part of China's commitment to fulfil its obligations under the Montreal Protocol and its Kigali Amendment, which aims to control and reduce HFCs due to their high global warming potential (GWP). The objective is to drive the household appliance industry towards low-carbon, environmentally friendly technologies and facilitate industrial transformation and upgrading.

The draft regulation stipulates that from 1 January 2026, the production of household refrigerators and freezers using HFCs as refrigerants will be prohibited. This prohibition applies to products defined by the standards listed in the Annex 2, specifically GB/T 8059 for household and similar refrigerating appliances. The move is in line with the "National Plan for China's Implementation of the Montreal Protocol on Substances that Deplete the Ozone Layer (2025-2030)", jointly issued in April 2025 by the MEE and other key ministries. China has committed to freezing HFC production and use by 2024, followed by progressive reductions.

For manufacturers, this means a shift away from HFCs, such as HFC-134a, which is currently used in a small percentage (less than 6%) of household refrigerators and freezers, primarily for export markets. The industry has a viable alternative in isobutane (R600a), a low-carbon, environmentally friendly natural refrigerant technology that is mature, widespread since 2000, and economically feasible. The regulation's focus is on the production aspect, directly affecting manufacturers, with local ecological environment authorities tasked with ensuring compliance.

More information can be found here in Chinese.

India

Revised Indian Standard on zinc phosphate pigment for paints (draft)

India’s Bureau of Indian Standards (BIS) is consulting on a revised version of IS 10897and has published its draft, which specifies requirements for zinc phosphate (CAS No. 7779-90-0) when used as a corrosion inhibitive pigment in the manufacture of ready mixed paints and priming in paints. This draft aims to respond to the need for safer alternatives to zinc chrome pigments, which present significant health hazards during production. Zinc phosphate has been identified as a

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suitable anti-corrosive pigment and is already in use in India. The update aligns the standard with the latest BIS style and format, and with international practice, drawing from BSI 5193:1975. Key updates include classification of pigments into three types, stricter limits on lead, new precautionary marking notes, and updated editorial corrections and references.

The draft includes Annexes A–D, which specify methods for testing key properties:

- Annex A – determination of loss on ignition
- Annex B – determination of zinc and phosphate content
- Annex C – determination of specific resistance of aqueous extract
- Annex D – determination of water-soluble chlorides and sulphates

These annexes detail test apparatus, reagents, procedures, and calculation formulas, providing standardized approaches to ensure product conformity.

The standard prescribes requirements for form, composition, and properties of zinc phosphate pigments. Pigments are classified into three types based on water of crystallization (dihydrate, mixed, tetrahydrate), each with specific ignition loss ranges. Products must be free from extenders, impurities, and organic dyestuffs. Chemical composition must fall within set ranges for zinc and phosphate content, with limits for volatile matter, sieve residue, pH, oil absorption, and soluble chlorides/sulphates. Stricter limits apply to “lead-free” zinc phosphate (≤ 90 parts per million). Containers must be clearly marked with the material name, manufacturer, batch number, type, declared shelf life, and date of manufacture. BIS certification marking is permitted under the BIS Act, 2016.

The draft was issued for comment in August 2025 with a deadline for feedback on 7 October 2025. Entry into force will follow finalization by BIS. No penalties are specified in this draft, but compliance is expected to be enforced through the Bureau of Indian Standards Act, 2016, which allows certification control.

Japan

Amendments to the "Act on the Examination and Regulation of Manufacture, etc. of Chemical Substances" (consultation)

The Japanese Ministry of Health, Labor, and Welfare has opened a consultation (comments were due on 19 September 2025) on proposed amendments to the "Implementation of the Act on the Examination and Regulation of Manufacture, etc. of Chemical Substances", which implements parts of the Chemical Substances Control Law (CSCL). The proposed amendments focus on clarifying the classification method for chemical substances and on how to handle impurities. The definition of impurities has been broadened to include trace amounts of byproducts, unreacted raw materials, reaction catalysts, etc. Additionally, the definition of "existing chemical substances" will be amended to include updated classification methods for mixtures, salts, polymers, and derivatives.

More information can be found here in Japanese.

The 2026 reception schedule for notification and applications related to the manufacture or import of new chemical substances (published)

On 19 September 2025, the Japanese Ministries of Health, Labor, and Welfare; Economy, Trade, and Industry; and the Environment announced the 2026 reception schedule for notifications and applications (can also be found here in Japanese) related to the manufacture or import of new chemical substances under the Chemical Substances Control Law (CSCL).

The schedule includes ten submission rounds, each with a deadline for preliminary review materials and a final notification date. The process involves a two-stage review: preliminary review by the National Institute of Technology and Evaluation (NITE) followed by council deliberation. Companies must register their intended submission via NITE's CSCL Contact System, then submit the preliminary materials to NITE's Safety Review Division by the specified deadlines. A simplified pathway exists where a judgement notification already exists for the same substance; another notifier may submit using a copy of that judgement notification, without preliminary or council review, by any of the scheduled notification dates.

Penalties are not mentioned in the update.

Singapore

Control of six mercury-added products adopted under the Minamata Convention (draft)

This update concerns Singapore's proposed control of six specific mercury-added fluorescent lamp products to reduce mercury pollution by minimizing their use with the goal of protecting human health and the environment. This initiative also aims to fulfil Singapore's obligations under the Minamata Convention, following the approval of these products for phasing out at the fifth Conference of Parties (COP-5) in October 2023. The regulation proposes to control the six specified mercury-added products as Hazardous Substances under the existing Environmental Protection and Management Act (EPMA).

Once the regulation takes effect, the import, export, and manufacture of these six mercury-added products will not be allowed. There are no other changes to the existing regulatory requirements within the EPMA. The products designated as S/N 1-4 (Compact fluorescent lamps > 30 watts, Compact fluorescent lamps with a non-integrated ballast ≤ 30 watts, halophosphate phosphor linear fluorescent lamps, and halophosphate phosphor non-linear fluorescent lamps) are planned for phasing out by 1 January 2027. Products S/N 5-6 (triband phosphor non-linear fluorescent lamps and triband phosphor linear fluorescent lamps) are planned for phasing out by 1 January 2028.

This update directly affects manufacturers, importers, and exporters by prohibiting their activities involving these specific mercury-added products after the respective effective dates. Retailers and distributors would also be impacted as the supply chain for these products would cease through import and manufacture.

South Korea

Notice of partial amendment to the "Regulations on the Operation of the Act on the Registration and Evaluation of Chemical Substances" (draft)

On 4 September 2025, the Ministry of Environment issued Announcement No. 2025-566 (can also be found here in Korean), publishing a draft partial amendment (can also be found here in Korean) to the Regulations on the Operation of the Act on the Registration and Evaluation of Chemical Substances. The purpose is to revise related provisions to support efficient administrative handling by competent authorities such as the National Institute of Chemical Safety.

The draft clarifies handling of chemical substance registration and notification, including specifying items to be confirmed upon receipt of applications such as manufacture or import volume and establishing provisions for processing applications for confirmation of exemptions from registration. It further clarifies procedures where a representative appointed by an overseas manufacturer or producer imports the same substance from another overseas manufacturer or producer.

Additional revisions supplement and revise operational matters, including performance reporting, guidance and inspections, and amendments to Article 3, Articles 6 to 9, Article 12, and attached forms.

Draft amendment to the "Enforcement Decree of the Act on Registration and Evaluation of Chemical Substances" (draft)

On 20 August 2025, the Ministry of Environment opened consultation on a draft amendment to the Enforcement Decree of the Act on the Registration and Evaluation of Chemicals. The amendment expands support measures for small and medium-sized enterprises to include activities aimed at reducing the use of highly hazardous chemicals. It also clarifies that tasks related to compliance education, training, and promotion may be delegated to designated institutions, including the Korea Environment Corporation, the Korea Environmental Preservation Association, and the Korea Chemical Management Association.

The deadline for comments was 29 September 2025. More information can be found here in Korean.

Revisions to the standards for classification, labeling, and safety data sheets for chemicals (effective)

On 6 August 2025, the Ministry of Employment and Labor adopted Notice No. 2025-50, revising the national standards on classification, labeling, and safety data sheets (MSDS) for chemicals. The regulation updates requirements for hazard communication, with a focus on aligning MSDS content and labelling practices more closely with international standards and ensuring clearer worker protection. The regulation is supported by annexes covering classification principles, labeling formats (Annex 3), and detailed MSDS content requirements (Annex 4).

Key updates include:

- revised structure and content requirements for MSDS (Annex 4), with mandatory information on product identity, hazards, composition, emergency measures, handling, storage, toxicology, environmental impacts, disposal, transport, and legal status
- clearer rules on hazard pictograms, wording ("Danger" or "Warning"), and size requirements for labels (Annex 3)

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- updated approval and disclosure system for confidential business information (CBI) in MSDS, with new evaluation criteria for substitute names and concentrations
- transitional provisions allow companies to continue using the previous MSDS format until 30 June 2026, after which all documents must comply with the new standard

The update requires companies to adopt the new MSDS format by mid-2026. There are no penalties mentioned in the amendment.

More information can be found here in Korean.

Taiwan

Amendments to the regulations on the registration and administration of new chemical substances (published)

On 8 August 2025, the Ministry of Labor issued amendments to the regulations on the registration and administration of new chemical substances. The amendments update procedural requirements for the registration of new substances not yet listed on the public inventory. Manufacturers and importers must submit a chemical substance safety assessment report to the central competent authority and obtain approval before manufacture or import. Applicants may entrust domestic institutions to handle submissions.

Registration type must be selected according to annual manufacture or import volumes, as outlined in Appendices 4 and 5, with four categories: standard, simple, small quantity, and low-concern polymers. The required information is specified in Appendices 1–3 and includes identification, manufacture/use/exposure information, hazard classification, safe use guidance, physical and chemical properties, toxicological information, hazard assessment, and exposure assessment.

Exemptions apply under certain conditions:

- substances already registered under the Toxic and Concerned Chemical Substances Control Act with the central environmental protection authority do not require re-registration
- low-concern polymers require prior confirmation by the central competent authority
- for 1–10 tonnes per year, substances not classified as Category 1 CMR are exempt from hazard and exposure assessment but not from registration
- for ten tonnes or more, substances without health hazards or risks due to their properties are exempt from exposure assessment, but hazard information remains required
- intermediates, polymers, substances for scientific research and development (R&D), or product/process R&D at restricted sites are exempt from hazard and exposure assessment obligations

There are no penalties associated with this update. More information can be found here in Chinese.

Turkey

Procedures and Principles for the implementation of Turkey REACH (in-force)

The Ministry of Environment, Urbanization, and Climate Change (the Ministry) published Procedures and Principles (also can be found here in Turkish) on 12 August 2025 to govern the practical implementation of the KKDİK Regulation, which

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regulates the registration, evaluation, authorization and restriction of chemicals in Turkey (a.k.a. Turkish REACH). These procedures provide guidance to manufacturers and importers to meet registration requirements following the 2023 amendment to the KKDİK Regulation that extended deadlines.

All manufacturers and importers placing one tonne or more of a substance on the market must register via the Chemical Registration System (KKS). Before submitting registrations, companies must provide a pre-SIEF[1] by 31 October 2025. For substances newly introduced after this date, pre-SIEFs must be submitted within 30 days of market placement. Registrants must join a joint registration unless a valid justification is accepted by the Ministry.

Lead registrants for existing substances must be selected by 31 December 2025, with new substances requiring a lead registrant within six months of market entry. Lead registrants are responsible for coordinating communication, data gap analysis, dossier preparation, and data sharing agreements with member companies. If a full registration dossier cannot be prepared on time, lead registrants must submit interim registration dossiers by 31 March 2026, followed by member companies by 30 September 2026. Interim dossiers must include the data specified in Annex 1 of the Procedures and Principles and be entered into the KKS by a certified chemical assessment expert.

The regulation also establishes procedures for electing or replacing lead registrants, rules for the functioning of joint registration groups, and the role of TOBB[2] in preparing standard contracts and reporting annually to the Ministry. Additionally, a chemicals science group composed of academic experts is created to advise the Ministry on unresolved issues and training needs.

Penalties are not mentioned in the update.

Amendment to the Communiqué on Import Controls of Chemicals Kept Under Control for Environmental Protection (in-force)

On 7 August 2025, the Ministry of Trade published an amendment to the Communiqué on Import Controls of Chemicals Kept Under Control for Environmental Protection (Product Safety and Inspection: 2025/6) in the Official Gazette No. 32979. The amendment updates provisions governing the import of controlled chemicals by revising Articles 12 and 13 and modifying Annex 6.

The revised rules prohibit the import of substances, mixtures, and articles listed in Annex 3/A and Annex 3/B, except under specific conditions. Substances in Annex 3/A may only be imported as laboratory reference standards, while chemicals in Annex 3/B may be imported only under exemptions listed in Annex 2 of the Regulation on Persistent Organic Pollutants, or for scientific research, development, or laboratory reference standards. In such cases, importers must apply to the Ministry of Environment, Urbanization and Climate Change for an exemption declaration acceptance letter (Annex 6).

Article 13 requires importers to present the appropriate control certificates at customs declaration: OTİM Control Certificate[3], Hydrofluorocarbon Control Certificate, or Exemption Declaration Acceptance Letter, depending on the substance category. Annex 6 has also been updated to revise the field on the “Exemption Subject.”

[1] The pre-SIEF process in the context of KKDIK Regulation refers to the initial stage of the registration process for chemical substances that are subject to the regulation.
[2] TOBB is the Union of Chambers and Commodity Exchanges of Turkey.
[3] OTIM Control Certificate is a document required for the import of certain chemicals that are controlled for environmental protection. OTIM is a Turkish acronym for “Ozone Tabakasini Incelten Maddeler,” which translates to “Ozone Depleting Substances”.

Penalties are not mentioned in the update.

More information can be found here in Turkish.

EUROPE

European Union

Three RoHS Directive exemption extension directives for the use of lead (amendment)

The European Commission (EC) adopted three EC delegated directives that amend Annex III of the RoHS Directive to extend exemptions for the use of lead as an alloying element in steel, aluminum and copper; in high melting temperature type solders; and in glass or in ceramic of electrical or electronic components, including dielectric ceramic in capacitors. These exemptions adapt to scientific and technical progress for specific applications of lead where its elimination is considered scientifically or technically impracticable, or where the reliability of substitutes is not ensured.

The directives replace the entries in Annex III of the RoHS Directive. However, the exemption categories have been split into numerous sub-categories reflecting specific applications, each with corresponding updated exemption expiry dates. Each of the three directives is accompanied by an annex that shows these updated categories and dates.

The directives must be applied by member states six months and one day after they have come into force. There are no penalties associated with this update.

Harmonized classification, labeling, and packaging updates (announced)

The European Chemicals Agency has published a number of harmonized classification, labeling, and packaging (CLP) updates.

Intentions
A harmonized classification and labeling (CLH) intention has been published for propylidynetrimethanol (EC No. 201-074-9; CAS No. 77-99-6). This substance is used in articles, by professional workers (widespread uses), in formulation or re-packing, at industrial sites and in manufacturing.

Consultations
The following eleven substances are open for CLH consultation with a deadline for commenting set for 31 October 2025:

- rosin, oligomers (EC No. 500-163-2; CAS No. 65997-05-9)
- rosin, maleated (EC No. 232-480-4; CAS No. 8050-28-0)
- rosin, hydrogenated (EC No. 266-041-3; CAS No. 65997-06-0)
- rosin, fumarated (EC No. 266-040-8; CAS No. 65997-04-8)
- rosin (EC No. 232-475-7; CAS No. 8050-09-7)
- resin acids and Rosin acids, maleated, esters with pentaerythritol (EC No. 305-516-2; CAS No. 94581-17-6)

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- resin acids and Rosin acids, fumarated, esters with glycerol (EC No. 307-051-0; CAS No. 97489-11-7)
- fatty acids, tall-oil, oligomeric reaction products with maleic anhydride and rosin, calcium magnesium zinc salts (EC No. 500-451-8; CAS No. 160901-14-4)
- fatty acids, tall oil, and rosin reacted with maleic anhydride (EC No. 940-281-5; CAS No. N/A)
- 1,1,3,3-tetramethylbutyl peroxyneodecanoate (EC No. 57-077-0; CAS No. 1240-95-0)
- (+/-) 2-(2,4-dichlorophenyl)-3-(1H-1,2,4-triazole-1-yl)propyl-1,1,2,2-tetrafluoroethylether; Tetraconazole (EC No. 407-760-6; CAS No. 112281-77-3)

The following three substances are open for CLH consultation with a deadline for commenting set for 24 October 2025:

- 3-aminopropyldiethylamine (EC No. 203-236-4; CAS No. 104-78-9)
- 3-aminopropyldimethylamine (EC No. 203-680-9; CAS no: 109-55-7)
- reaction products of boric acid with didecylamine and ethylene oxide (EC No. N/A; CAS No. N/A)

Intention submitted

The following four CLH intentions were submitted:

- α-cyano-3-phenoxybenzyl 3-(2,2-dichlorovinyl)-2,2-dimethylcyclopropanecarboxylate (EC No. 257-842-9; CAS No. 52315-07-8)
- antoferine (ISO); ethanol extract from wood of Vitis vinifera (Vitaceae) (EC No. N/A; CAS No. N/A)
- (1S)-2,2-bis(4-fluorophenyl)-1-methylethyl N-{[3-(acetyloxy)-4-methoxy-2-pyridyl]carbonyl}-L-alaninate (EC No. 837-247-6; CAS No. 1961312-55-9)
- 2-N-[(1R,2S)-2,6-dimethyl-2,3-dihydro-1H-inden-1-yl]-6-(1-fluoroethyl)-1,3,5-triazine-2,4-diamine (EC No. 936-023-6; CAS No. 950782-86-2).

Opinions adopted

- milbemectin (EC No. N/A; CAS No: 1799297-76-9)
- titanium dioxide (EC No. 236-675-5; CAS no: 13463-67-7)

Draft screening report of reaction products of 1,3,4-thiadiazolidine-2,5-dithione, formaldehyde, and 4-heptylphenol, branched and linear in articles for comments and evidence (consultation)

The European Chemical Agency (ECHA) has published a call for evidence concerning the draft screening report of reaction products of 1,3,4-thiadiazolidine-2,5-dithione, formaldehyde, and 4-heptylphenol, branched and linear (RP-HP) in articles (comments were due on 8 October 2025). The call for evidence aims to allow interested parties to express their views and concerns on the draft screening report on the presence and risk of reaction products of RP-HP in articles. This draft screening report was prepared according to REACH Article 69(2), which allows ECHA to consider if risks from the use of the substance in articles are adequately controlled after the sunset date has passed for substances(s) included on the Authorization List (REACH Annex XIV).

ECHA is calling for evidence to gather information on:

- uses and/or presence of RP-HP substances in imported articles
- any relevant information about RP-HP substances in articles that have not been included in the Draft Screening Report

Should ECHA determine that the use of RPHP pose a risk to humans or the environment that is not adequately controlled, ECHA will then prepare an Annex XV Restriction Dossier.

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Intention to restrict the manufacture, placing on the market, and use of 1,4-dioxane in surfactants (withdrawn)

On 27 August 2025, ECHA updated the registry of restriction intentions until outcome to record the withdrawal of Germany's intention to restrict the manufacture, placing on the market, and use of 1,4-dioxane (EC No. 204-661-8; CAS No. 123-91-1) in surfactants. The restriction was originally notified on 19 April 2023 and was expected to be submitted on 3 October 2025. The proposal aimed to minimize emissions of 1,4-dioxane, a carcinogenic category 1B substance that is persistent and mobile in aquatic environments, including drinking water resources. Germany identified the manufacture of surfactants as the major source of emissions. The proposal was withdrawn on 20 August 2025 to allow Germany to assess new information on emission pathways and possible regulatory measures. Germany stated that the outcome of this assessment will be communicated through the German helpdesk for REACH; classification, labeling and packaging; and biocides.

Updated proposal to restrict per- and polyfluoroalkyl substances under the REACH Regulation (proposal)

On 20 August 2025, the European Chemicals Agency (ECHA) published an updated proposal to restrict per- and polyfluoroalkyl substances (PFAS) under the REACH Regulation. The update was prepared by the authorities of Denmark, Germany, the Netherlands, Norway, and Sweden, incorporating the evaluation of over 5,600 comments received during the 2023 public consultation. The proposal aims to reduce PFAS emissions and make products and processes safer for people.

The update expands the scope of assessment to sectors such as sealing applications, machinery applications, technical textiles, electronics and semiconductors, and broader industrial uses including solvents and catalysts. It also considers conditional restriction options beyond full bans or time-limited derogations, allowing continued manufacture, placing on the market, or use of PFAS where risks can be controlled. These alternatives were assessed for PFAS manufacturing, transport, electronics and semiconductors, energy, sealing applications, machinery applications, and technical textiles.

ECHA's Committees for Risk Assessment and Socio-Economic Analysis are currently reviewing the updated proposal. Their opinions will inform the European Commission, which will decide on the restriction in consultation with European Union Member States.

Call for evidence for substances of concern in packaging and packaging waste (consultation)

The European Chemicals Agency (ECHA) has opened a call for evidence to gather information on substances of concern in packaging, as mandated by the Packaging and Packaging Waste Regulation (PPWR), which replaced the Packaging and Packaging Waste Directive (comments due on 28 October 2025). Under PPWR, the European Commission, supported by ECHA, must prepare a study report identifying substances of concern in packaging. The report will also consider appropriate follow-up measures, such as restrictions on substances of concern in packaging.

The objective of this call is to gather information from relevant stakeholders about the preparation of the study report. Information needed includes packaging materials and their use, tonnages, substances used in packaging, their manufacturing and downstream processing/recycling as well as waste management and the recycling technologies used.

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France

Draft order on specifications regarding professional packaging (draft)

On 2 September 2025, the French authorities opened a public consultation on a draft order that establishes specifications for producer responsibility organizations, individual systems, and the coordinating body managing the extended producer responsibility (EPR) scheme for professional packaging. A linked draft perimeter order is included within the consultation scope and defines criteria for classifying packaging as household-like or specific to catering activities. The measure builds on Article L. 541-10-1 of the Environmental Code and follows a related decree consulted on in November 2024. The draft order consists of four articles and six annexes and amends the specifications of the household packaging and chemical products EPR schemes. The consultation closed on 23 September 2025.

The draft order sets objectives and modalities for implementing producer responsibility obligations for professional packaging. It aims to improve collection and recycling of professional packaging waste, shift financial responsibility from waste holders (e.g., businesses) to producers where sorting conditions are met, and promote reuse.

Published stakeholder comments highlight significant concerns, including that weight-based eco-contribution calculations could penalize reusable packaging against single-use alternatives, opposition to exempting cardboard from reuse targets, and a perceived lack of support for developing reuse infrastructure and traceability.

More information can be found here in French.

Sweden

Proposition to align penalty provisions with the European Union's revised regulations on fluorinated greenhouse gases and ozone-depleting substances (draft)

On 11 September 2025, the Swedish government submitted Proposition 2025/26:13 proposing amendments to Chapter 29 of the Environmental Code to align national penalty provisions with the European Union's (EU's) revised regulations on fluorinated greenhouse gases (F-gases) and ozone-depleting substances (ODS). The proposal updates reference from the previous EU regulations to the new ones and introduces criminal liability for intentional or negligent releases, complementing EU prohibitions on placing on the market and export. It clarifies liability across activities connected to manufacture, import, export, placing on the market, installation, maintenance, and leak checks of products and equipment containing or relying on these substances.

Key changes include:

- criminalizing intentional or negligent releases of F-gases and ODS into the atmosphere
- extending penalties across additional handling stages, including supply, and making available within the EU
- introducing a fines-only offence for failure to document fumigation activities using sulfuryl fluoride
- requiring valid licenses to be presentable at import and export for relevant gases, products, and equipment

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The amendments are designed to support enforcement and deter non-compliance, with penalties including fines or imprisonment for up to two years for relevant environmental hazardous chemical handling offences. Most provisions are set to enter into force on 1 January 2026, with later effective dates for specific F-gas provisions on 1 January 2032 and 1 January 2035 to allow for industry adaptation.

More information can be found here in Swedish.

Switzerland

Amendment to the Ordinance on the Protection against Dangerous Substances and Preparations (in force)

On 14 August 2025, Switzerland published in the Amtliche Sammlung (AS 2025 506) an amendment to the Ordinance on the Protection against Dangerous Substances and Preparations (ChemV). The amendment, adopted on 31 July 2025 by the Federal Office of Public Health in agreement with the Federal Office for the Environment and the State Secretariat for Economic Affairs, entered into force on 1 September 2025.

The amendment updates Annex 2 by incorporating the European Union (EU) Classification, Labeling, and Packaging Regulation Annexes I-VII and recognizing all amendments up to the 23rd ATP (Delegated Regulation (EU) 2025/1222). Annex 3 is updated by reference to the Candidate List of substances of very high concern, which contains 247 entries as of 1 September 2025. Testing of substance properties must follow methods set out in EU Regulation (EC) No 440/2008, OECD Guidelines (June 2025 version), or the United Nations Manual of Tests and Criteria (8th revised edition 2023, Amendment 1 2025).

Transitional measures allow substances listed in the 22nd ATP (EU 2024/2564) to be placed on the market without updated classification and labeling until 30 April 2026, and substances listed in the 23rd ATP (EU 2025/1222) until 31 January 2027.

Penalties are not mentioned in the update. More information can be found here in German, French, and Italian.

United Kingdom

Restriction report on the use of per- and polyfluoroalkyl substances in firefighting foams (consultation)

On 18 August 2025, the Health and Safety Executive (HSE), acting as the Agency for UK REACH and supported by the Environment Agency, published an Annex 15 restriction report on the use of per- and polyfluoroalkyl substances (PFAS) in firefighting foams (FFF). The report assesses risks to human health and the environment and proposes restrictions on the placing on the market and use of PFAS in FFF, with sector-specific transition periods.

To inform the next stage of the UK REACH restriction process, HSE has launched a six-month public consultation seeking evidence and comments on the proposed restriction and transition periods. The consultation will support the development of proportionate, evidence-based regulatory measures.

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NORTH AMERICA

Canada

Red tape reduction reports that catalogue completed, ongoing, and planned actions to streamline administration and regulatory processes while maintaining human health and environmental protection (published)

In September 2025, Canada's Environment and Climate Change Canada (ECCC) and Health Canada together with the Public Health Agency of Canada (PHAC) released departmental red-tape reduction reports that catalogue completed, ongoing, and planned actions to streamline administration and regulatory processes while maintaining human health and environmental protections. The reports form part of a government-wide red tape review launched in July 2025, under which federal organizations collectively identified several hundred burden-reduction initiatives.

ECCC is advancing several chemicals-focused initiatives over the next few years:

- Prohibition of certain toxic substances regulations (2012): ECCC plans to finalize updates by spring 2026, which will:
  - tighten restrictions on long-chain per- and polyfluoroalkyl substances (PFAS) and certain flame retardants
  - add dechlorane plus (CAS No. 13560-89-9) and decabromodiphenyl ethane (DBDPE; CAS No. 84852-53-9) to the regulated list
  - remove outdated cross-references, adjust permit timing, and harmonize thresholds with other jurisdictions
- Certain products containing toxic substances regulations (March 2025): This acts as a consolidation model, covering substances such as coal tar/PAHs and 2-butoxyethanol
- Modernization of other regulations and systems:
  - New substances notification regulations (chemicals and polymers): Streamlined to reduce barriers for notifications
  - Canadian Environmental Protection Act registry upgrade: Substances and applicable requirements will be listed in one central location
  - PCB regulations: Amendments expected by spring 2026 to introduce flexibility
  - volatile organic compounds limits for architectural coatings: Being aligned with leading U.S. states
  - chromium electroplating/anodizing/reverse etching regulations: Guidance will be updated to reflect current industry practice

Health Canada and PHAC are organizing actions under five key themes: international alignment and reliance, improved client experience, risk-based oversight, targeted streamlining, and enabling safe innovation.

Chemicals-focused measures include:

- hazardous products regulations: Enforcement discretion will focus on compliance promotion until July 2027, aligning with U.S. hazard communication timelines for mixtures
- risk-based regulation: Departments plan to scale back inspections in areas where compliance is high and underlying risk is low

Penalties are not mentioned in the update.

United States

First mandatory five-year review regarding access to hydrofluorocarbons for five applications (published)

On 22 August 2025, the United States Environmental Protection Agency (EPA) finalized the first mandatory five-year review of application-specific allowances, renewing limited, priority access to hydrofluorocarbons for five applications through 2030. Priority access continues for propellants in metered-dose inhalers, certain foams for marine and trailer uses, etching of semiconductor material or wafers and cleaning of chemical vapor deposition chambers, mission-critical military end uses, and onboard aerospace fire suppression. EPA also clarified that defense sprays are excluded from the aerosol requirements established under the 2023 Technology Transitions Rule and therefore will not receive application-specific allowances eligibility from calendar year 2026 because they can source necessary hydrofluorocarbons from the open market. The agency states that this rule does not result in significant changes to the hydrofluorocarbon phasedown program overall.

Proposed renewal and consolidation of existing Information Collection Requests related to the regulation of methylene chloride (published)

The Environmental Protection Agency (EPA) opened a consultation on proposed renewal and consolidation of existing Information Collection Requests (ICRs) related to the regulation of methylene chloride (CAS No. 75-02-2) under Section 6(a) of the Toxic Substances Control Act (TSCA), which comments due on 24 October 2025. The update concerns the information collection requirements necessary to implement and enforce rules regarding methylene chloride. The EPA is consolidating two existing ICRs into one, titled “Methylene Chloride; Regulation under TSCA § 6(a)” (EPA ICR No. 2556.04; OMB Control No. 2070-0204).

The information collection activities covered by this ICR relate directly to the substantive methylene chloride regulations, which mandate the prohibition of the manufacture, process, and distribution of methylene chloride for all consumer use and most industrial and commercial uses.

Draft risk evaluation for octamethylcyclotetrasiloxane (published)

EPA has released a draft risk evaluation under the Toxic Substances Control Act (TSCA) for octamethylcyclotetrasiloxane (D4; CAS No. 556-67-2) and is seeking public comments. The purpose of TSCA risk evaluations is to assess whether a chemical substance poses an unreasonable risk to human health or the environment under its conditions of use, including potential risks to exposed or susceptible subpopulations identified by EPA, without considering costs or other non-risk factors. Using the best available science, EPA has prepared this draft risk evaluation and preliminarily determined, based on

the weight of scientific evidence, that D4 presents an unreasonable risk to human health and the environment, primarily due to specific conditions of use analyzed in the evaluation.

Comment on the draft is open until 17 November 2025. More information can be found here.

OCEANIA

Australia

Reminder of the post introduction declaration deadline and release of the Industrial Chemicals Categorization Guidelines (effective)

On 21 August 2025, the Australian Industrial Chemicals Introduction Scheme (AICIS) reminded introducers that a post-introduction declaration (PID) is required by 30 November 2025 for introductions first made between 1 September 2024 and 31 August 2025 that are in the exempted category and meet one of the following:

- polymer of low concern (PLC)
- low-concern biological polymer
- very low risk for human health and the environment

For AICIS purposes, an introducer is any person or business that imports or manufactures an industrial chemical in Australia; agents may submit on their behalf, but the registered introducer remains responsible. Resubmission is not required if a PID has already been lodged and the introduction circumstances have not changed. A separate PID is required for each qualifying exempted introduction. Agents or consultants may submit PIDs on behalf of the registered introducer.

Furthermore, on 1 September 2025, AICIS released the September 2025 Industrial Chemicals Categorization Guidelines and updated the online guide to categorizing chemical importation and manufacture, with changes effective 1 September 2025. AICIS first flagged these guideline changes in February 2025 following public consultation. The updated online guide is version 3.4. Updates include 118 new entries to the list of chemicals with high hazards for categorization and the removal of CAS 395058-31-8 9 and 395058-32-9 (both branches perfluorooctanoic acid – or PFOA) of from the final list.

This list is used by introducers when determining human health and environmental risk during categorization. Additional clarifications address information needed to demonstrate absence of skin corrosion (part 6.12.2) and skin sensitization (part 6.14.2), improve descriptions of information sources (part 8.1), and correct part 8.4.1 to state that the Organization for Economic Co-operation and Development (OECD) Series No. 129 is not an OECD test guideline. Formatting, naming, and footnote re-organization improve accessibility and align the guidelines with other AICIS publications. Annual updates coincide with the AICIS registration cycle each 1 September.

Penalties are not mentioned in the update.

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SOUTH AMERICA

Brazil

Restrictions on the use of certain hazardous substances in electronic equipment (consultation)

Brazil's National Environment Council (CONAMA) proposed a draft resolution (comments were due on 24 September 2025), that establishes restrictions on the use of certain hazardous substances in electrical and electronic equipment (EEE) commercialized within the national territory. The primary objective is to contribute to environmentally sound final disposal of EEE and protect human health and the environment. The regulation is rooted in Brazil's National Environmental Policy (Law nº 6.938 of 1981) and the National Solid Waste Policy (Law nº 12.305 of 2010), specifically addressing waste management and environmental protection.

The resolution mandates that EEE, including wires, cables, and spare parts, can only be manufactured, imported, distributed, and commercialized if they do not contain concentrations of the following substances exceeding specific limits per mass of homogeneous material:

- polybrominated Biphenyls (PBB) – 0.1%
- polybrominated Diphenyl Ethers (PBDE) – 0.1%
- mercury (CAS No. 7439-97-6) – 0.1%
- cadmium (CAS No. 7440-43-9) – 0.01%
- hexavalent chromium (CAS No. 18540-29-9) – 0.1%
- lead (CAS No. 7439-92-1) – 0.1%
- di(2-ethylhexyl) phthalate (CAS No. 117-81-7) – 0.1%
- benzyl butyl phthalate (CAS No. 85-68-7) – 0.1%
- dibutyl phthalate (CAS No. 84-74-2) – 0.1%
- diisobutyl phthalate (CAS No. 84-69-5) – 0.1%

Under the resolution, the Ministry of Environment and Climate Change is required to create a “National Registry of EEE with Restrictions on Hazardous Substances” to consolidate data on EEE subject to the restrictions. Initial registrations will be required within one year of the system's availability.

More information can be found here in Portuguese.

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