

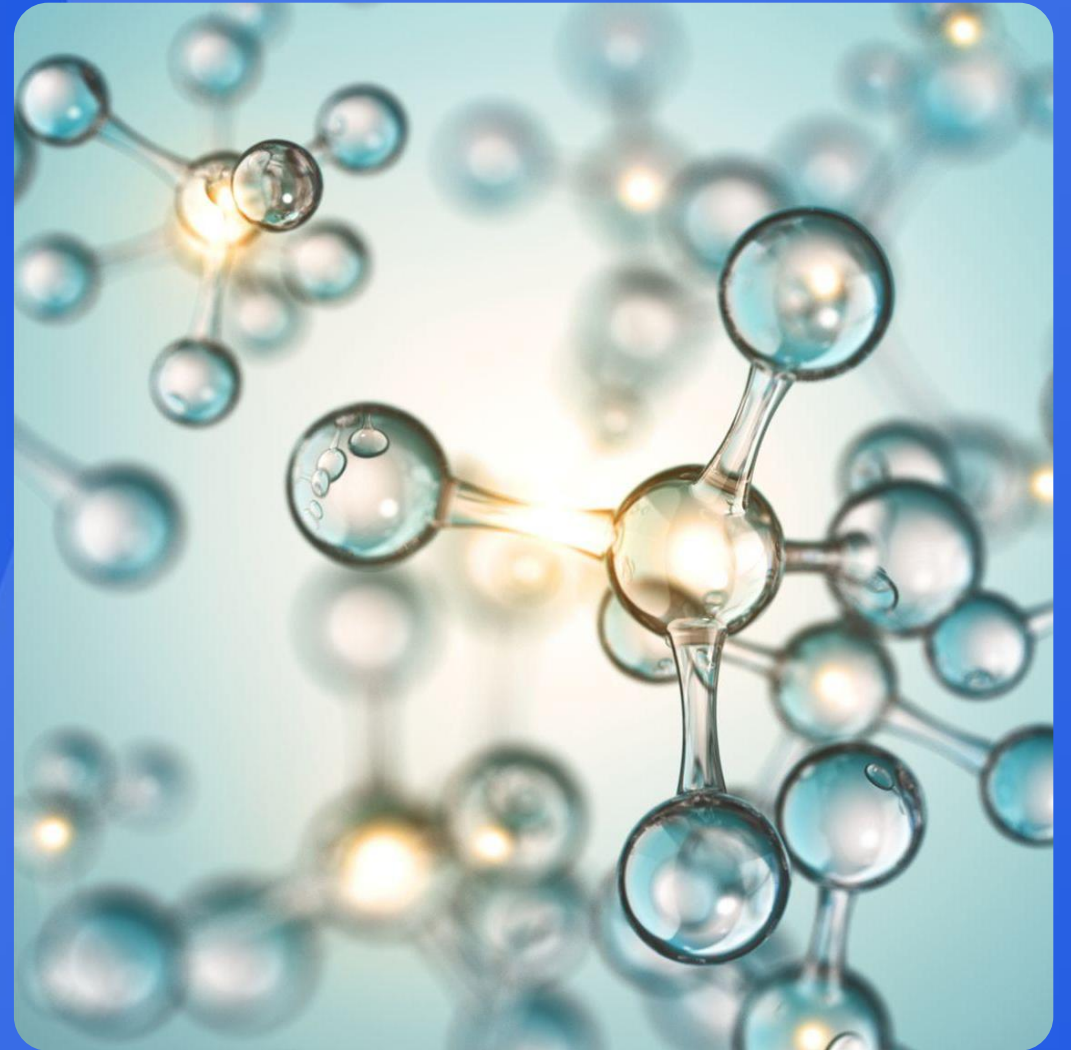


Compliance & Risks

Webinar

# Chemicals Quarterly *Q1 2025 Regulatory Update*

23 April, 2025



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Q&A  
Session

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# Meet the Team



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# Mission Statement

**Ensure global companies have the tools  
& information to build safe, sustainable,  
products in a world full of change**

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**100K<sup>+</sup>**  
Regulations

**195**  
Countries

**10<sup>+</sup>**  
Industries

**28**  
Languages

**30**  
Global  
Network  
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Expert Queries  
answered



WHAT WE DO

# Unlocking Market Access

Keep on top of regulatory changes and their impact worldwide. Early warning alerts, impact probability, productivity workflow tools and so much more.



# Agenda

- 01.** Global
- 02.** South America
- 03.** North America
- 04.** Australia/NZ
- 05.** Asia
- 06.** Europe







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# Global



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# 2025 RSLs

## AFIRM and AAFA release updates

AFIRM Group 10th ed.	AAFA 25th ed.
<ul style="list-style-type: none"><li>• Increases product quality / safety</li><li>• Reduces environmental impact</li><li>• Covers substances in:<ul style="list-style-type: none"><li>○ Apparel and footwear</li><li>○ Accessories</li><li>○ Jewelry</li><li>○ Sporting goods</li><li>○ Wearables</li><li>○ Home textiles</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Chemical restrictions in home textiles, apparel, and footwear products</li><li>• 16 categories with more than 250 chemicals</li><li>• Reflects updates to regulations / laws</li><li>• Appendix on reporting</li></ul>

**\*Both RSLs can be found on their websites**



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# Australia/New Zealand



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# Australia PFAS Consultation

**AICIS sought feedback on 'designated fluorinated chemicals'**

- **Assessment required before manufacture or import**
- **Reflects current scientific understanding of PFAS.**

**Comments due:** 8 April 2025

# NZ Approval to Restrict POPs

## HSNO Act:

- **Schedule 2A now includes:**
  - Methoxychlor
  - Dechlorane Plus
  - UV-328

**Effective date:** 14 March 2025



# Asia





# China PFAS Consultations

**Initiative to gather information on:**

- Long-chain PFCAs
- PFOA
- PFHxS

**Comments due:** 19 May 2025

# China Drafts GB 30981.2 Revision

## Limits

- VOCs
- Formaldehyde
- Benzene
- Toluene and xylene
- Heavy metals
- Biocides
- Phthalates
- Asbestos

## Hazard Marking

- Toy & wood coatings
- Industrial coatings & putty
- Solvent-based coatings
- Multi-component curing coatings
- Special functional coatings
- Zinc-aluminium coatings

**Comments Due:** 11 March 2025

# China Proposes New FCM

## Draft to expand additives for food contact materials:

- Hexanedioic acid polymer
- Ammonium salt of dodecanoic acid
- 3-Aminopropyltriethoxysilane

**Comments due:** 19 April 2025.





# India Amends Battery Rules for Heavy Metals

## Battery Waste Management Amendment Rules

2025:

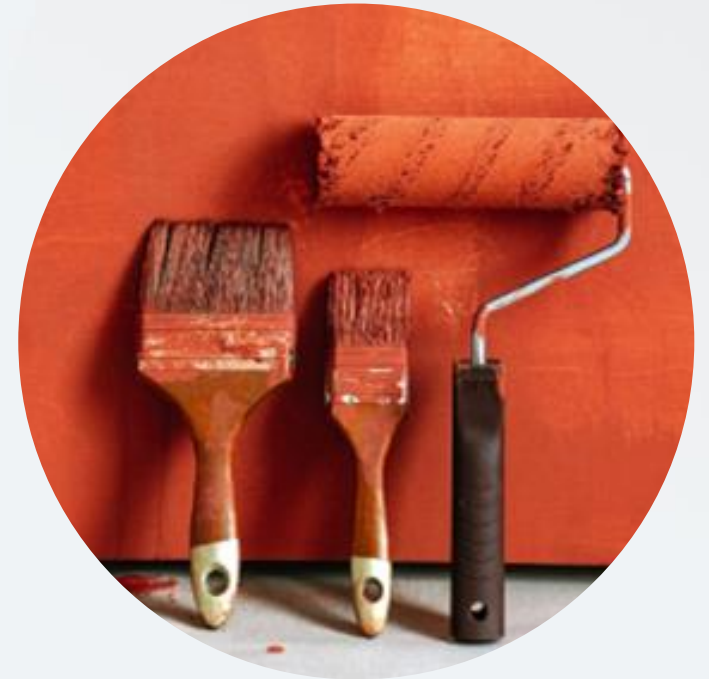
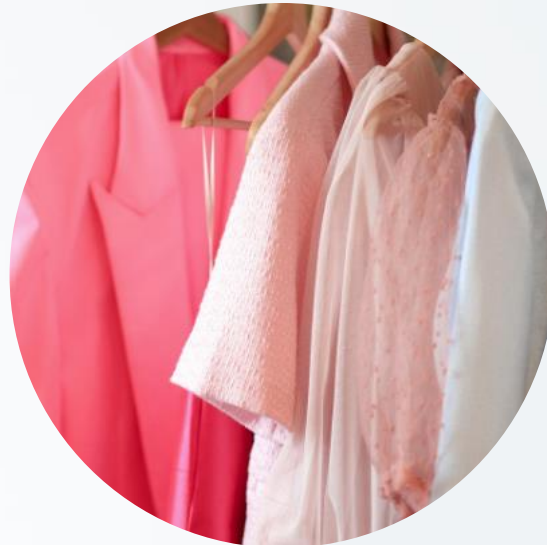
- Packaging exemption
- Alternative labeling (with EPR registration #)
- **Heavy metal marking exemptions**
  - <0.002% for Cd
  - <0.004% for Pb

**Effective date:** 24 February 2025



# Jordan Lists Prohibited and Restricted Chemicals

- **Prohibits:** chemicals used in the manufacture of textile products that come into direct contact with the skin
- **Limits:** lead in the household paint industry
  - $\leq 0.009\%$



# Japan PFS Ban

## Annex 1

- **Perfluorooctanoic acid-related substances:**
  - Perfluorooctyl iodide
  - Fluorotelomer alcohol
  - Compounds with pentadecafluoroalkyl group

## Annex 2

- Water/oil repellent textiles
- Antifoaming agents
- Water/oil repellent, antifouling agent and fiber protectant
- Optical fiber surface coating agents
- Water/oil repellent floor coverings
- Floor waxes

**Effective Date:** 10 January 2025



# Japan Prohibits FCM Substances

- **Class I Chemical Substances**
  - **Banned for use as raw materials in:**
    - **Utensils**
    - **Containers**
    - **Packaging**

**Comments due:** 20 February 2025



# Singapore Regulates New Substances

- **EEE:** 0.1% by weight of homogeneous material.
- **Batteries:** 0.0005% by weight per cell.
- **Fluorescent Lamps:** 5mg -> 10mg
- **Measuring Devices:** specific condition use only
- **Photographic paper & Propellants:** no mercury permitted

**Effective Date:** 1 August 2025

# Criteria for Designating K-REACH Substances

- **Introduces new substance definitions:**
  - Acutely toxic
  - Chronically toxic
  - Ecotoxic
- **Reflect terminology changes**
- **Expand list of chemical substances**
- **Revising disclosure scope**

**Comments due:** 25 March 2025

# Criteria for K-REACH Unconfirmed Hazards

- Update notification requirements
- Establish assessment procedures
- Incorporate terminology changes
- Revise and expand disclosure procedures
- Adjust registration criteria
- Align text submission requirements

**Comments due:** 25 March 2025

# Europe





# — EU Adopts BPA Ban in FCM

## Prohibits BPA in:

- Coatings on metal cans
- Reusable plastic drink bottles
- Water distribution coolers
- Various kitchenware

**Effective date:** 20 January 2025

# Chemicals in EU Packaging

## Packaging and Waste Regulation (EU) 2025/40

- Limits and phase-out for PFAS in food-contact packaging
- Launches ECHA role to improve chemical safety of packaging

**Effective date:** 11 February 2025



# EU Drafts New PBDE Limits

- **New UTC limit value in (EU) 2019/1021 for:**
  - tetraBDE, pentaBDE, hexaBDE, heptaBD, and decaBDE
  - Phased reduction:
    - 500 mg/kg upon entry into force
    - 350 mg/kg as of 30 December 2025
    - 200 mg/kg as of 30 December 2027
    - 10 mg/kg for other mixtures and articles

**Comments due:** 18 March 2025

# Belgium Proposes PFAS Ban

## Product targets:

- FCM (packaging, cookware) - non-stick/grease resistance
- Textiles (clothing, upholstery)
- Cosmetics
- Wax products (ski wax)



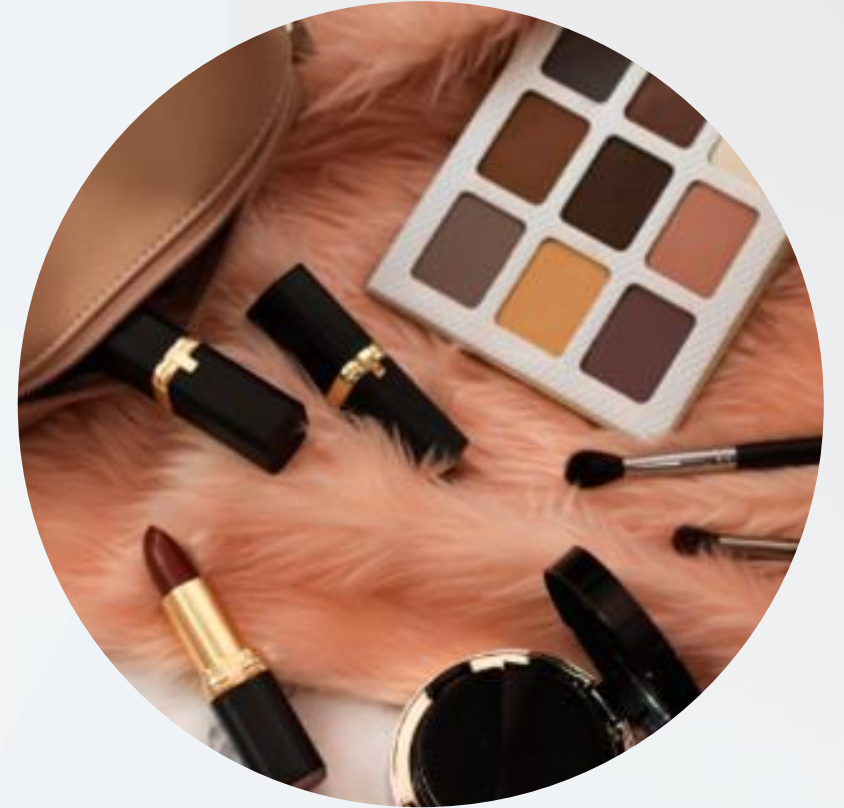
# France Adopts PFAS Ban

## Effective January 1, 2026:

- Cosmetics
- Clothing & footwear
- Ski waxes

## Effective January 1, 2030:

- All textiles





# Türkiye KKDIK (REACH) Implementation

## Draft procedures and timelines

- Notification and registration submissions
- Working Group establishment
  - Chemicals Science
  - Chemicals Advisory
- Company collaborations

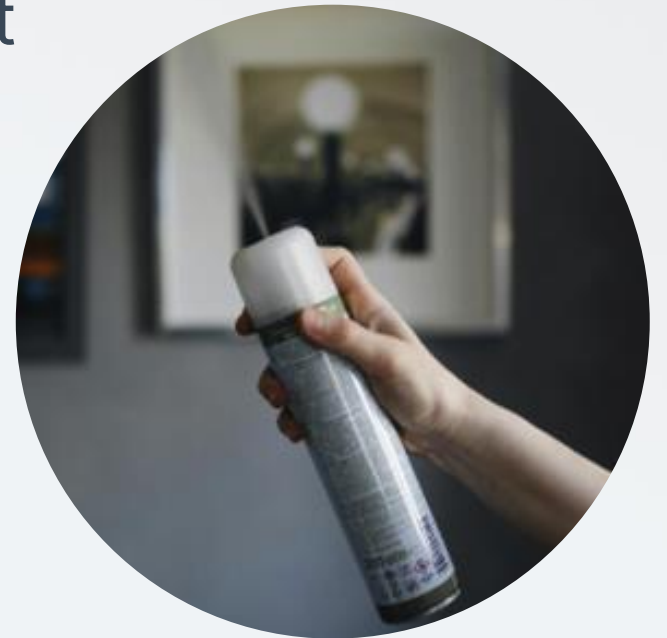
**Comments Due:** 27 January 2025

# Türkiye Chemical Inspections

## Communiqué 2025/6:

- Ozone Depleting Substances = prohibited
- Fluorinated Greenhouse Gases = HC Certificate
- Other chemicals = prohibited unless exempt
- Import Procedures
- Certificates validity / restrictions

**Effective date:** 1 January 2025



# UK Amends POP Legislation

## Amendment 1 (UK SI 2025/296)

- UTC limit values (HCB & PCP)
- PFOA revisions
- Adds DP, methoxychlor and UV-328
- Waste requirements changes

## Amendment 2 (UK SI 2025/297)

- DP & UV-328 exemptions

**Effective Date:** 1 April 2025



# South America



# Brazil Adopts MERCOSUR Resolutions

## Food Packaging & Food Contact Equipment Updates

RDC No. 961: Positive list of monomers, starting substances and polymers

- Implementation of MERCOSUR/GMC/RES No. 28/24
- Adds: Tetramethyl Bisphenol F Diglycidyl Ether TMBPF-DGE and Polyamide-imide 2 (PAI-2)
- Came into effect: **10 February 2025**

RDC No. 963: Positive list of additives and polymeric coatings

- Implementation of Resolution MERCOSUR/GMC/RES No. 22/24
- Adds: Silver glass and Diethylaminoethanol
- Came into effect: **20 February 2025**



# Upcoming Chile Registration Deadline

## Hazardous substances for non-industrial use

**9 February to 30 August 2025**

Notification required for:

- Hazardous according to GHS
- Non-exempt substances under Decree 57/2019
- Professional or consumer uses
- Production or import volume > 1 tonne per year
- Substances in mixtures are exempt from this round



# Colombia Begins Substance Registration

**Hazardous industrial substances registration due 30 May 2025**

Includes substances in mixtures

**Production or import threshold = one tonne per year over three years**

- Information required for registration on INSQUI
- Identification of producer/importer
- Annual production/import quantities
- CAS or IUPAC identification of substance
- Hazard classification
- Recommended uses



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# North America



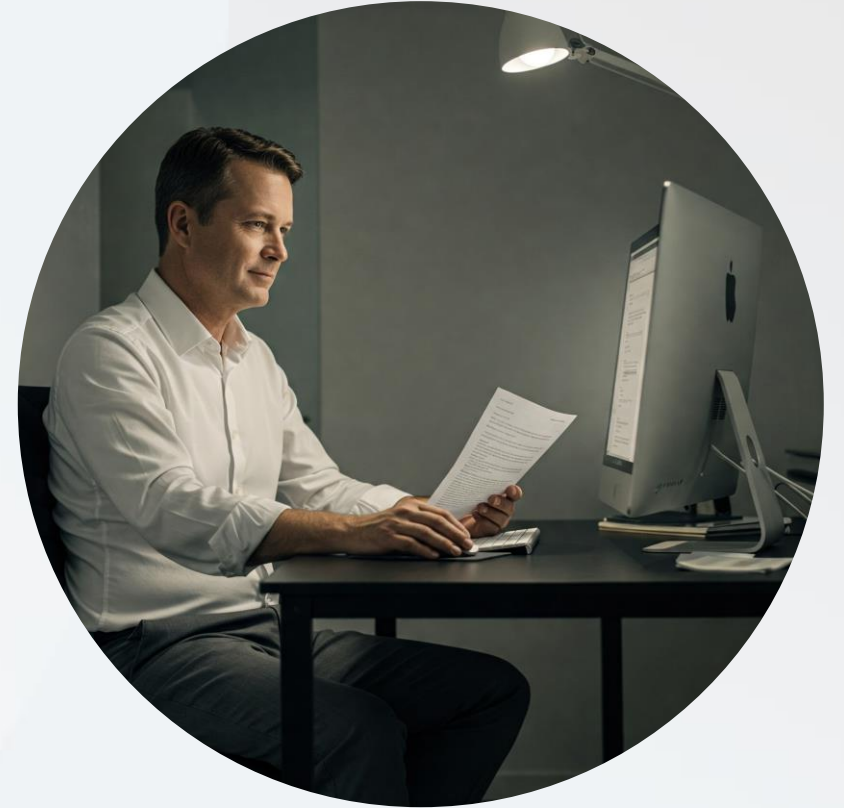
→ | [complianceandrisks.com](https://complianceandrisks.com)

# IRIS Toxicological Reviews

## Final and draft

- Inorganic arsenic (Final)
- Perfluorohexanesulfonic Acid (PFHxS) (Final)
- Chloroform (Draft)

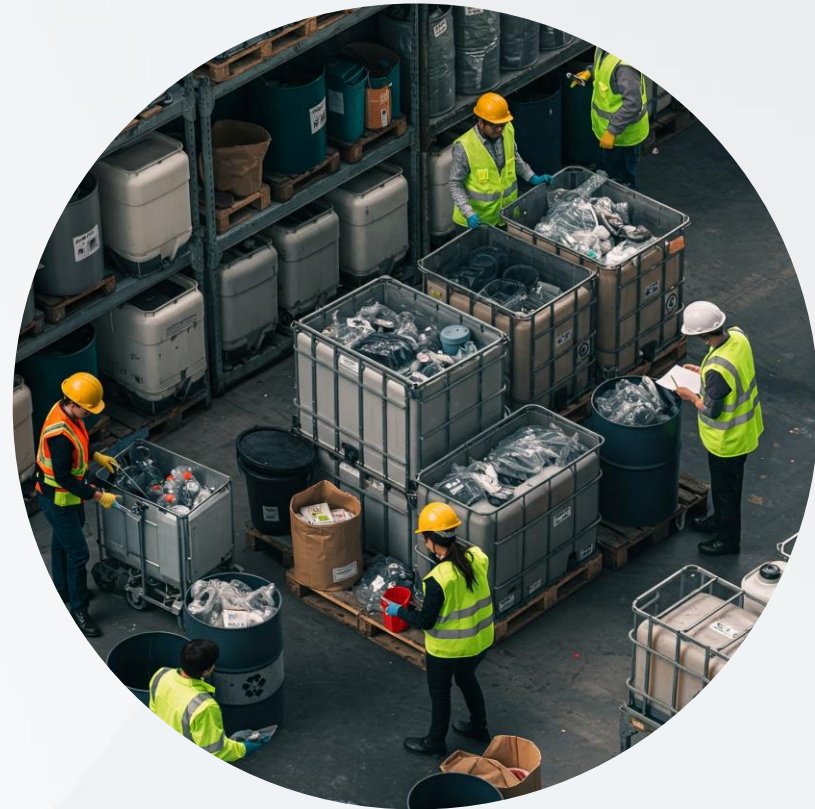
**Comments closed:** 18 February



# January Additions to TRI

## Federal PFAS Updates

- 9 additional PFAS
- Begins for 2025 reporting year
- Effective date: **21 March 2025**



# Key Date Modifications

## TSCA

TCE regulation effective date extension

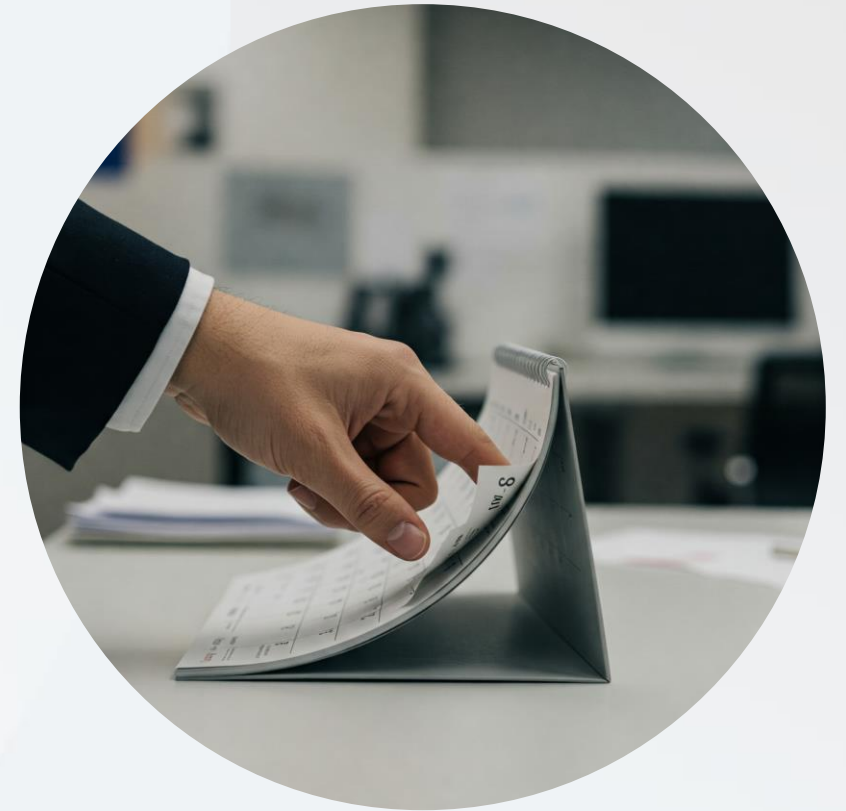
- New effective date: **21 March**

C.I. Pigment Violet 29 (PV29)

- Comments due: **28 February**

CBI claims extension of statutory review period

- New review period ends: **19 February 2026**





# TSCA Risk Evaluations Available

## Final and Drafts

- Formaldehyde (Published: 3 January 2025)
- Diisodecyl Phthalate (DIDP) (Published: 6 January 2025)
- Diisononyl Phthalate (DINP) (Published: 15 January 2025)
- Vinyl Chloride - DRAFT SCOPE

**Comments reopened, now due:** 3 March 2025

- Dicyclohexyl phthalate (DCHP) - DRAFT

**Comments due:** 10 March 2025

# Amendment to Add Group 19–5.F Substances

## Finalized Significant New Use Rules

- Soybean meal, reaction products with phosphoric trichloride
- 2-propenoic acid, alkyl, polymers with alkyl acrylate and polyethylene glycol methacrylate alkyl ether (generic)
- Calcium, carbonate 2-ethylhexanoate neodecanoate propionate complexes
- Propanoic acid, 3-hydroxy-2-(hydroxymethyl)-2-methyl-, polymer with dimethyl carbonate, 1,2-ethanediamine, 2-ethyl-2-(hydroxymethyl)-1,3-propanediol, 1,6-hexanediol and 1,1'-methylenebis[4-isocyanatocyclohexane], compd. with N,N-diethylethanamine
- Substituted polyalkylenepoly, reaction products with alkene polymer (generic)
- Alkenoic acid, polymer with alkanediyl bis substituted alkylene bis heteromonocycle, substituted carbomonocycle and (alkylalkenyl) carbomonocycle, alkali metal salt (generic)

**Effective date:** 7 March 2025

# Health and Safety Reporting Rule Update

## Deadline extended

### Unpublished health & safety studies due 9 September (except vinyl chloride)

- 4,4-Methylene bis(2-chloraniline)
- 4-tert-octylphenol(4-(1,1,3,3-Tetramethylbutyl)-phenol)
- Acetaldehyde
- Acrylonitrile
- Benzenamine
- Benzene
- Bisphenol A
- Ethylbenzene
- Naphthalene
- Vinyl Chloride (due **11 June**)
- Styrene
- Tribromomethane (Bromoform)
- Triglycidyl isocyanurate
- Hydrogen fluoride
- 6PD
- 6PPD-quinone

# California Food Packaging Changes

## Prop 65 and Proposed AB 1148

Vinyl Acetate added to Prop 65 list

- Carcinogenic
- Warning requirement effective on: **3 January 2026**

Safer Food Packaging Act of 2025 (AB 1148)

- Ortho-phalates
- Bisphenols
- Antimony trioxide



# Flame Retardants in Safer States Act

## Georgia HB 9

### Covered products

- Bedding
- Carpeting
- Children's products
- Residential upholstered furniture
- Window treatments

### Prohibited flame retardants, >1,000 ppm

- Tris(1,3-dichloro-2-propyl)phosphate
- Tris(2-chloroethyl)phosphate
- Antimony trioxide
- Hexabromocyclododecane
- Bis(2-Ethylhexyl)-3,4,5,6-tetrabromophthalate
- 2-Ethylhexyl-2,3,4,5-tetrabromobenzoate
- Chlorinated paraffins
- Tris(1-chloro-2-propyl) phosphate
- Pentabromodiphenyl ether
- Octabromodiphenyl ether
- Decabromodiphenyl ether
- Tetrabromobisphenol A
- Any other chemical flame retardants specified by the office pursuant to Code Section 25-15-122

# Toxic Chemicals in Packaging

## Minnesota SF 1380

### Prohibited substances

- Polyvinyl chloride
- Polyvinylidene chloride
- Polystyrene, including expanded polystyrene
- Polycarbonate
- Polyethylene terephthalate glycol
- Polyethylene terephthalate (opaque or pigmented)
- Antimony trioxide
- Melamine
- Ortho-phthalates
- Bisphenols
- Halogenated flame retardants
- Non-detectable pigments, including carbon black
- Oxo-degradable/oxo-biodegradable additives
- UV 328
- Short- and medium-chain chlorinated paraffins
- Benzophenone or its derivatives
- Formaldehyde
- Perchlorate

Effective date (if enacted): **1 January 2028**



# New York Action Across Product Categories

<b>A 1976</b>	<b>Toxic chemicals in pet products</b>
<b>A 3661</b>	<b>HFCs</b>
<b>A 4542/ S 1767</b>	<b>Cookware containing polytetrafluoroethylene</b>
<b>A 6500</b>	<b>Lead in all consumer products</b>
<b>S 2540</b>	<b>Phthalates in toys and childcare products</b>
<b>S 6816</b>	<b>Flame retardants in tents</b>



# Microplastics in Products

**Rhode Island H 549/ S 406**

Microparticles prohibited:

- All dimensions are equal to or less than 5 millimeters (5mm); or
- Length is equal to or less than 15 millimeters (15mm) and the particle's length is more than three times its diameter (elongated, like a fiber).

Includes microplastics from breakdown of products

Effective date (if enacted): **1 January 2029**

# Lead in Cookware

## Washington SB 5628

Prohibition would begin **1 January 2026** on cookware/cookware components containing lead/lead compounds > 5ppm

- Cookware includes: Metal pots, pans, bakeware, rice cookers, pressure cookers, utensils
- Excludes: Large appliances without metal food-contact surfaces
- Inaccessible components definition added



# PFAS Bills Introduced this Quarter

State	Bill Number	Products
California	AB 333	Textiles
California	SB 682	Cleaning products, Cookware, Dental floss, Juvenile products, Food packaging, Ski wax, Refrigerants, Solvents, Fire suppressants
Hawaii	HB 644/SB 1020	Single-use food contact items
Illinois	HB 1295	Carpets or rugs, Cleaning products, Compostable products, Cookware, Cosmetics, Dental floss, Fabric treatments, Food packaging, Intimate apparel, Juvenile products, Menstrual products, Ski wax, Textile furnishings, Upholstered furniture
Illinois	SB 0117/HB 2516	Cookware, Cosmetics, Dental floss, Food packaging or food contact products, Intimate apparel, Juvenile products, Menstrual products
Iowa	HF 588	Carpets or rugs, Cleaning products, Cookware, Cosmetics, Dental floss, Fabric treatments, Firefighting foam, Firefighting PPE, Food packaging, Juvenile products, Menstruation products, Textile furnishings, Ski wax, Upholstered furniture

State	Bill Number	Products
Kentucky	HB 102	All products - new reporting requirements proposed
Maine	Chapter 90	Products containing intentionally added PFAS but determined to be a currently unavoidable use
Massachusetts	SB 1504/ HB 2450	Child passenger restraints, Children's products, Cookware, Fabric treatment, Personal care products, Product components, Rugs and carpets, Textiles, Textile furnishings, Upholstered furniture
Minnesota	HF 1906/ SF 2410	Electronic and internal components, lead-containing products, firefighting foam for airport hangars
Kentucky	HB 102	All products - new reporting requirements proposed
Maine	Chapter 90	Products containing intentionally added PFAS but determined to be a currently unavoidable use
Nevada	SB 173	Carpets or rugs, Cookware, Cosmetics, Fabric treatments, Food packaging, Indoor textile furnishing, Indoor upholstered furniture, Juvenile products

State	Bill Number	Products
Rhode Island	H 6059	Proposal to delay ban in general consumer products to January 1, 2027. Also adds artificial turf and outdoor apparel to scope (January 2029, unless labeled)
Rhode Island	S 645	Food contact
Vermont	HB 212	Adult Mattress, Aftermarket Stain & Water-Resistant Treatments, Apparel, Aqueous Film Forming Foam (AFFF), Artificial Turf, Carpets & Rugs, Cleaning Products, Complex Durable Goods, Consumer Products, Cookware, Cosmetic Products, Dental Floss, Fluorine-Treated Containers, Food Packaging & Containers, Incontinency Protection Products, Juvenile Products, Menstrual Products, Outdoor Apparel, Personal Protective Equipment (PPE), Pesticides, Ski Wax, Textile & Textile Articles, Upholstered Furniture

# Significant New Activities

- **Notice No. 21912**
  - Phosphoric acid, mixed decyl and octyl esters, potassium salts (CAS 70879-47-9)
- **Notice No. 21861**
  - trisiloxane,  
3-ethyl-1,1,1,3,5,5,5-heptamethyl-  
(CAS 17861-60-8)



# New Authorizations in Canada

Ministerial Condition No. 21979

Permitted multi-walled carbon nanotubes

- 96% composed of elemental carbon
- Individual nanotubes length and diameter = small-gauge

Prohibited

- ***Consumer products generating respirable particles***
- Coatings > 0.01%
- Structural materials > 0.06%

**Effective date:** 21 February 2025

## Potential Obligations

- Notification at least 120 days prior to commencement of activity
- Recordkeeping
- Written confirmation of transfer of the substance
- Detailed flow charts in the notification
- Disposal of substance
- Notification of environmental release
- Handling of substance



# Canada's SOR/2025-36

## Prohibitions and restrictions begin October 2025

### Containing coal tar and distillates:

- Pavement sealant products, roofing sealant products, and sealant products for certain industrial uses

### Containing polycyclic aromatic hydrocarbons > 1,000 ppm:

- Pavement sealant products and roofing sealant products

### 2-Butoxyethanol Concentration Limit (% w/w)

- Automobile cleaner other than automobile degreaser or internal engine cleaner  $\leq 10.0$
- Rug or carpet cleaner  $\leq 10.0$
- Floor or baseboard stripper  $\leq 2.0$
- Paint stripper or thinner  $\leq 0.5$
- Laundry stain remover  $\leq 22.0$
- Any other aerosol cleaner that is not a pump-spray  $\leq 5.0$
- Any other non-aerosol cleaner  $\leq 6.0$
- Aerosol paint or coating other than a pump-spray  $\leq 0.1$
- Non-aerosol paint or coating  $\leq 0.5$

# Canada's SOR/2025-36

## Prohibitions and restrictions begin October 2025

### Domestic substances list

- Order 2024-87-24-01
- Order 2024-87-20-01
- Order 2025-66-03-01
- Order 2025-87-03-01
- Order 2025-112-03-01
- Order 2024-87-21-01
- Order 2025-87-02-01

### Non-Domestic substances list

- Order 2025-87-03-02
- Order 2025-87-02-02

### Part 2, Schedule 1 of Environmental Protection Act

- PFAS (proposed for addition to Part 2)
  - Comments due: **7 May 2025**
- Decabromodiphenyl ethane and Dechlorane Plus
  - Effective: **14 February 2025**
- Chlorhexidine
  - Effective: **31 January 2025**

# State of PFAS

## Canada proposes adding PFAS to CEPA

### Phased approach:

- I. Firefighting foam
- II. *Consumer products with existing alternatives (some textiles, food packaging, etc.)***
- III. Continued evaluation and assessment of other sectors

**Comments due:** 7 May 2025

# Provincial Regulation of PFAS

## Nova Scotia's Bill 34

Prohibit sale of all products with intentionally added PFAS, except:

- Medical devices, per Health Canada
- ***"Essential products"***

**Ban begins (if enacted):** 1 January 2028

# Questions?



# Lets Talk



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