

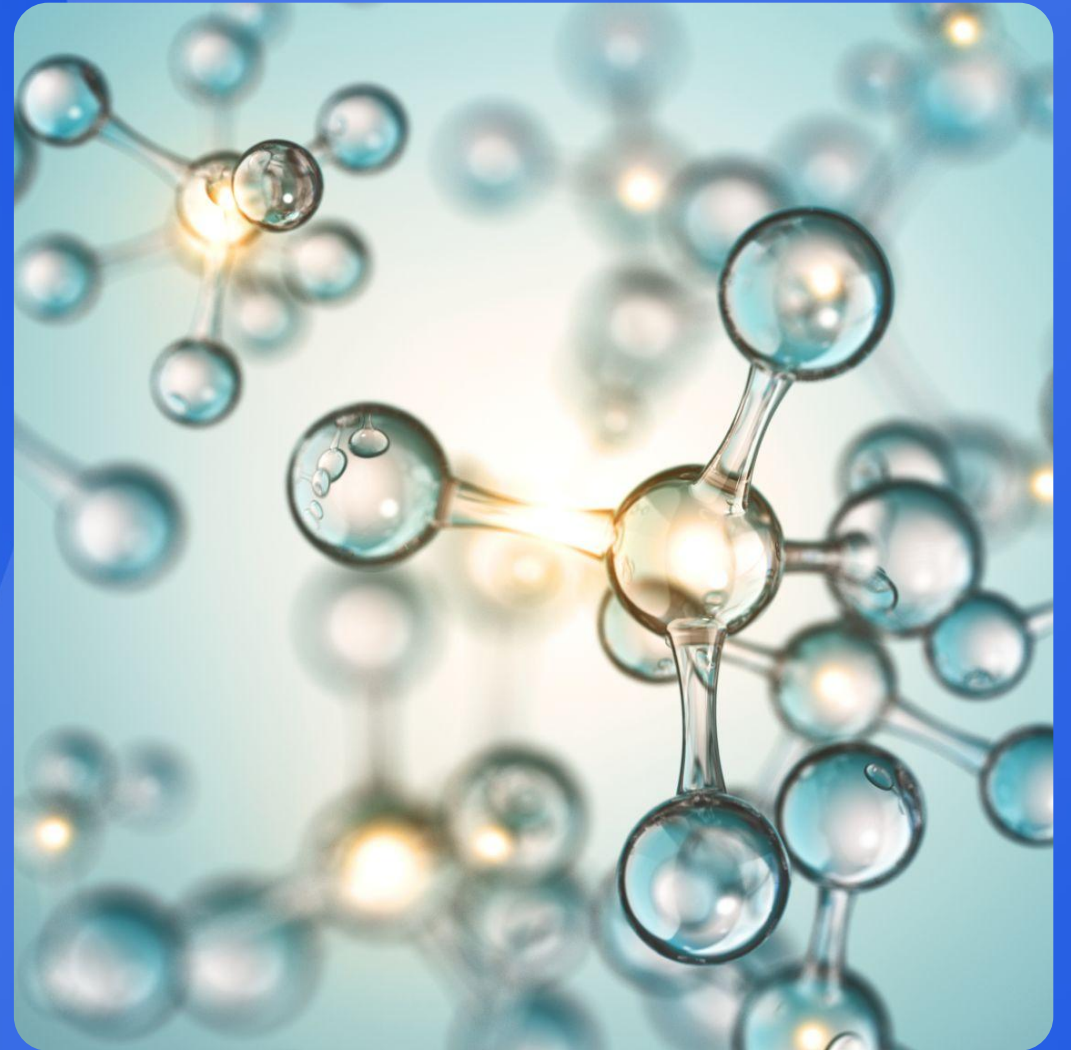


Compliance & Risks

Webinar

Chemicals Quarterly ***Q2 2025 Regulatory Update***

16 July, 2025



→ | complianceandrisks.com



Q&A
Session

Slides &
Webinar
Recording



Request a
Demo



Webinar Platform Tips



Compliance & Risks

Meet the Team



Cassie Pershyn
Senior Regulatory Content
Specialist, Content Research
& Development



Kim Plassche
Senior Regulatory Content
Specialist, Content
Research & Development



Orlaith Morris
Content Marketing
Manager

Mission Statement

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

Trusted by the World's Leading Brands

SAMSUNG

Miele



EPSON®



FUJITSU



BELDEN

PHILIPS

logitech

XEROX®

Thermo
SCIENTIFIC



GARMIN™



Compliance & Risks



100K⁺
Regulations

195
Countries

10⁺
Industries

28
Languages

30
Global
Network
Partners

9.6k
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. Africa/Middle East**
- 06. Asia**
- 07. Europe**





Compliance & Risks

Global



→ | complianceandrisks.com

Stockholm Convention updates

SC-12/9

Chlorpyrifos added to Annex A with limited, registered exemptions

Exemptions for certain pest control, livestock, and wood preservation uses

SC-12/12

LC-PFCAs, their salts, and related compounds added to Annex A with exemptions

Exemptions for semiconductors and vehicle replacement parts, until 2041 or end of service life

SC-12/10

MCCPs listed in Annex A; production and use generally banned

Exemptions for flexible PVC, adhesives, coatings, and replacement parts in key sectors

Disclosure, worker protection, and phase-out timelines mandated



Compliance & Risks

South America



→ | complianceandrisks.com

Brazil suspends consultation

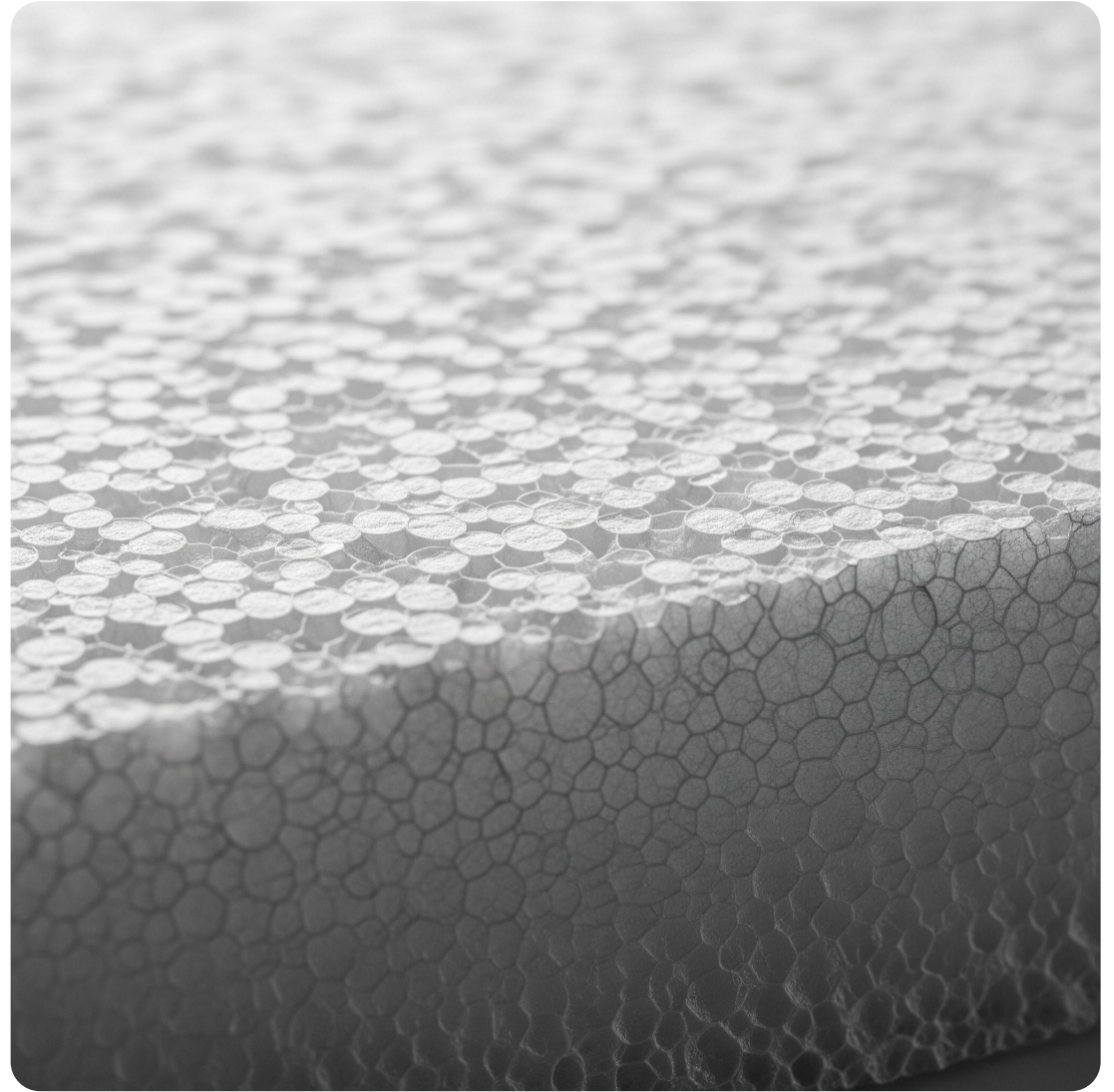
Implementation of Law 15.022/2024

- Public consultation opened **13 May 2025**, then temporarily suspended for adjustments
- Original 30-day comment period to be extended to 60 days upon reopening
- Draft regulates registration, risk assessment, and management of chemical substances
- Applies to substances produced or imported ≥ 1 ton/year; prioritization and risk management outlined
- No reopening date announced; stakeholders advised to monitor official Ministry updates

Dominican Republic drafts prohibition

Expanded Polystyrene

- Five-Year Ban on Expanded Polystyrene Foam
- Applies to Single-Use Products



Mercosur GMC.Res. 02/2025

Amends Resolution GMC/Res. 40/2015

Restricts diisopropylnaphthalene in finished products containing recycled fibers

- "Low as technically feasible"

Must be incorporated in legislation by 21 October 2025

North America



Trichloroethylene →

- Specific workplace conditions for the exempted uses of TCE (like in battery manufacturing) were delayed until **20 June 2025**
- Additional delay now in effect until **19 August 2025**



TSCA reporting updates

PFAS reporting period delays

- Applies to PFAS and PFAS-containing articles manufactured/imported since **1 January 2011**
- One-time reporting is delayed again: **13 April 2026**
- Comments on the rule were due **12 June 2025**

Consolidation of requirements under Section 8

- Feedback requested on necessity, practicality, burden and methods of enhancing quality and utility of information
- Comments due **8 July 2025**

Significant *New Use Rules* issued

16 June: 23-4.5e

- Sulfonium, bis(3,4-polyhalocarbo-cyclic)aryl-, .alpha., .alpha., .beta., .beta.-polyhalopolyhydro-2,2-diaryl-4,7-methano-1,3-heteropolycyclic-5-alkanesulfonate (1:1) (PMN P-21-204)
- Aromatic sulfonium tricyclo fluoroalkyl sulfonic acid salt (generic) (PMN P-22-55)
- Sulfonium, tricarbo-cyclic-, 2-heteroatom-substituted-4-alkylcarbomono cyclecarboxylate (1:1) (PMN P-22-152)
- Sulfonium, tricarbo-cyclic-, salt with [polyhydro-2-alkyl-5-(polyhalo-2-heteroalkyl)-alkano-1,3-hetropolycyclic]alkyl polyhaloaryl ester (1:1) (generic) (PMN P-22-161)

23 June: 24-4.5e

- Polyester polyol (generic)
- 2,4,8,10-Tetraoxa-3,9-diphosphaspiro[5.5]undecane, 3,9-bis-[2-(1-methyl-1-phenylethyl)-4-(1,1,3,3-tetramethylbutyl)phenoxy]-
- 1-Propanamine, 3-methoxy-N,N-dimethyl-
- Metal, [heteropolycyclic]-, [[[hydroxyalkyl)amino] sulfonyl] alkyl]sulfonyl(sulfoalkyl)sulfonyl derivs., ammonium sodium salts (generic)
- And 31 other substances



Draft risk evaluations

Dibutyl Phthalate & Diethylhexyl Phthalate

- Used as plasticizers
- Also used in adhesives, sealants, paints, coatings, and rubbers
- Comments on effectiveness and use of PPE, and human health and environmental hazards requested

Comments due: **19 August 2025**

FDA warning to importers

- *A. catechu* palm leaves = potentially leached chemicals including arecoline, arecaidine, guvacoline, and guvacine
- Pre-market notification required for future marketing



California considers microplastics

- Proposal would allow DTSC to identify and regulate products containing or generating microplastics
- Listing enables alternatives analysis and possible future restrictions, but does not itself ban any products
- Comments due: **4 August 2025**



Illinois PFAS actions

HB 2516

- Passed both chambers on **31 May 2025**; sent to Governor on **24 June 2025**
- Bans sale/distribution of select consumer products with intentionally added PFAS starting **2032 January 1**
- Products affected: cosmetics, dental floss, juvenile products, menstrual products, intimate apparel

HB 1295

- Requires manufacturers to report PFAS product information to Illinois EPA by **1 January 2027**
- Restricts sale of many PFAS-containing products from **1 January 2026**; blanket ban by **1 January 2033**
- Includes specific rules and exemptions for firefighting foam and federally regulated products
- Last action **21 March** in committee

Maine PFAS prohibition

Chapter 90

"Currently Unavoidable Uses"

- Applicable if a product determined to meet the statutory definition of "essential for health, safety, or the functioning of society"
- CUUs in a prohibited category beginning January 1, 202 - proposal submissions due **1 June 2025**
- Notification requirements for CUUs

LD 1982

Definition change: chemical substances with at least one of three defined substructures:

- (1) $R-(CF_2)-CF(R')R''$, where both the CF_2 and CF moieties are saturated carbons;
- (2) $R-CF_2OCF_2-R'$, where R and R' can either be F , O or saturated carbons; or
- (3) $CF_3C(CF_3)R'R''$, where R' and R'' can either be F or saturated carbons

Alignment with EPA standard definition

Massachusetts flame retardant update

- Original regulations effective: **31 December 2021**
- Covered products
 - Bedding
 - Carpeting
 - Products for children 12 years of age or under
 - Residential upholstered furniture
 - Window treatments for indoor residential or indoor commercial use
- Banned chemicals: TDCPP, TCEP, Antimony trioxide, HBCD, TBPH, TBB, Chlorinated paraffins, TCPP, PentaBDE, OctaBDE, TBBPA



PFAS reporting & fee updates

Minnesota proposes Chapter 7026

- Proposed rules require PFAS product reporting and fees, per 2023 state law
- Manufacturers must report products with intentionally added PFAS by **1 January 2026**
- Annual updates or recertifications required for changes or new products
- Fees: \$1,000 initial report, \$500 annual update/recertification, \$300 extension request (adjusted for inflation)
- Exemptions for federally regulated products, used goods, and certain other categories
- Waivers, extensions, and trade secret protections available under specified conditions

Lead and cadmium exemptions

- Limits in covered products
 - Lead 0.009% (90 ppm)
 - Cadmium 0.0075% (75 ppm)
- "Covered products" include toys, jewelry, school supplies, cookware, keys, and more
- New exemptions for keys and internal solder under specific conditions
- Keys with $\leq 1.5\%$ lead allowed after **1 July 2028**



PFAS bill stalls



- HB 290 died in May
- Sought to prohibit PFAS in certain products, including cosmetics, juvenile products and menstrual products by **1 January 2028**



PFAS ban expanded

- Adds ski wax, boat wax, surfboard wax and similar
- Effective: **60 days following enactment (July 2025)**



New Jersey considers PFAS

H 5600

- Prohibits sale and distribution of key consumer products with intentionally added PFAS after **three years**
- Requires labeling of cookware containing PFAS after **one year**
- Phases in restrictions and labeling for outdoor apparel designed for severe wet conditions
- Applies to a wide range of products, including apparel, carpets, cosmetics, food packaging, juvenile and feminine hygiene products, ski wax, and textiles

A 5260

- Any apparel, broadly defined, after **two years**



New Mexico: PFAS regulation enacted

HB 212 enacts PFAS Protection Act

- Signed into law **8 April**
- Exemptions include certain fluoropolymers and federally regulated uses
- Manufacturers must report PFAS use to the New Mexico Environment Department

Phased implementation

- Phase 1 (2027): bans PFAS in cookware, food packaging, dental floss, juvenile products, firefighting foam
- Phase 2 (2028): bans PFAS in carpets, cleaning products, cosmetics, textiles, feminine hygiene, ski wax, furniture
- Blanket ban on all non-exempt PFAS products by 2032 unless "currently unavoidable"

New York State session ends

Adjourned: 17 June 2025

A 7738

- PFAS: Textile articles, rugs, fabric treatments, cookware, ski waxes, architectural paints (including interior and exterior architectural coatings), cleaning products (including air care, automotive, general cleaning, polishes, and floor maintenance products), dental floss, and any component of these products

A 8585

- PFAS: carpets and rugs,, cookware, cosmetic products, fabric treatments, and personal care products

S 7839

- PFAS: Medical adhesives and bandages

S 3852

- PFAS, PAHs and lead: Playground surfacing materials

New York State session ends

AB 8848/S 8412

- Extends mattress chemical exemption to 2027 (from 2026)
- Applies to specific fiber components in mattresses: *Textiles made using modacrylic fiber components without antimony trioxide when used internally as a barrier material in a memory foam or gel foam mattress or aramid fibers when used in the fabric that covers the bottom (non-sleep surface) of a mattress that has a sleeping surface on only one side of the mattress*

A 6679

- Bans sale and distribution of mercury-added lamps effective January 1, 2028

North Carolina

HB 881

- Broad prohibition on manufacture, use, and distribution of PFAS statewide, except where federally mandated
- Requires disclosure and elimination of PFAS and 1,4-dioxane in industrial discharges
- Funds water treatment, monitoring, and health research on PFAS contamination

HB 882

Creates extended producer responsibility for packaging producers

Prohibition in packaging: Ortho-phthalates, bisphenols, PFAS, lead and lead compounds, hexavalent chromium and compounds, cadmium and cadmium compounds, mercury and mercury compounds, benzophenone and its derivatives, halogenated flame retardants, perchlorate, formaldehyde, toluene, polyvinyl chloride, polystyrene, and polycarbonate

Excludes:

- Material intended for long-term storage or protection of a durable product expected to be usable for at least five years
- Medical devices and packaging included with products regulated by FDA
- Packaging for hazardous substances regulated under the FIFRA

PFAS proposal



- Introduced **13 May 2025**; session runs through **31 December** —still under consideration
- Phased PFAS bans: **2027** (cookware, food packaging, dental floss, juvenile products, firefighting foam); **2028** (carpets, cleaning products, cosmetics, textiles, more); **2032** (all non-exempt products)
- Manufacturers must report PFAS content by **1 January 2027**, and keep information current
- Exemptions for federally regulated products, certain equipment, and solid fluoropolymers



Oregon enacts restriction

Aerosol dusters



- Aerosol dusters containing 1,1-Difluoroethane may only be sold to 18+
- Warning label with poison control number required



HB 238 updates PFAS law in Vermont

- Amends PFAS in products law (9 V.S.A. chapter 63, subchapter 12a)
- Now clarifies cleaning products, dental floss
- Pacifiers included; children's ATVs exempt
- New sales ban on fluorine treated containers beginning **1 January 2032**



Lead in cookware →

- Only aluminum or brass cookware and utensils covered
- **Lead limits:** 90 ppm by **1 January 2026** and 10 ppm by **1 January 2028**
- Lower limits possible after **December 2030**
- **Exempt:** Fully stainless steel-enclosed items and some appliances



New Authorizations in Canada

- Ministerial Condition No. **22183**: Cyclohexanecarboxylic acid, 4-(difluoromethyl)-1,1-dimethylethyl ester
- Ministerial Condition No. **22184**: 1,2,4,5-Benzenetetracarboxylic acid, 3,6-dichloro-, 1,2,4,5-tetramethyl ester
- Ministerial Condition No. **22185**: 2-Propenoic acid, 2-methyl-, 2-ethylhexyl ester, polymer with ethenylbenzene, methyl 2-methyl-2-propenoate and 2-propenoic acid, sodium salt
- Ministerial Condition No. **22186**: 1-hexene, 3,3,4,4,5,5,6,6,6-nonafluoro-



Compliance & Risks

Australia/New Zealand



→ | complianceandrisks.com

Australia proposes DBDPE & mercury restrictions

Decabromodiphenyl Ethane (DBDPE)

- **Proposal under IChEMS Schedule 6:**
 - manufacture prohibited
 - import, export, and use restricted
 - UTC \leq 10 mg/kg
 - handling of waste under 500 mg/kg
- **Importers must:**
 - communicate DBDPE in products
 - maintain records
 - meet IChEMS minimum standards

Mercury and Mercury Compounds

- **Proposal under Minamata Convention:**
 - manufacture prohibited
 - essential use exemptions:
- **Continued use permitted for:**
 - Existing mercury-containing articles
 - Remaining imported stock until depleted
- **Additional obligations:**
 - Maintain up-to-date records
 - Provide information to authorities
 - Prevent contamination
 - Comply with waste treatment rules
 - Waste reporting for mercury \geq 15 mg/kg



Compliance & Risks

Africa/Middle East



→ | complianceandrisks.com

South Africa – new hazardous substance designations

Group I, Category A Hazardous Substances

- all substances listed in Annex III of the Rotterdam Convention
- mercury and compounds permitted under the Minamata Convention
- industrial substances, mixtures, or product that pose serious health risks during normal use or handling, including:
 - acute, reproductive, organ toxicity
 - carcinogenicity
 - germ cell mutagenicity
 - classified under the EU's harmonized classification list and the UN GHS system

Group I, Category B Hazardous Substances

- Pesticides or agricultural remedies that:
 - meet criteria for substance of concern or restriction
 - are not considered low risk
 - include severely hazardous pesticides listed in Annex II of the Rotterdam Convention
 - are subject to registration and approval

Effective Date: 4 October 2025

Asia



China-FCM approvals

Approval of:



- Phthalate esters
- Vinyl chloride and related compounds
- Tetramethyl-1,3-cyclobutanediol
- N-Nitrosamine compounds
- 4,4' Bisphenol and Bis(4-chlorophenyl) sulphone

Updates to:

- GB 9685 for the use of additives in FCM
- GB 7718 labeling for prepackaged food

Proposed for use:

- Barium sulfate (not for children's products)
- Pentaerythritol
tetrakis(3-(3,5-di-tert-butyl-4-hydroxyphenyl)propanoate) in PVDF (polyvinylidene fluoride) materials
- **Comments due:** 12 June 2025



Compliance & Risks



Macau & Hong Kong - Bans on Mercury & HFCs

Macau - Order No. 109/2025

- bans mercury-added products effective 1 January 2026, in compliance with the Minamata Convention
- exemptions apply for scientific research, calibration, and reference use

Hong Kong - Mercury Control Ordinance

- amended to phase in restrictions on 16 mercury-added products, with the first 8 taking effect 31 December 2025

Hong Kong - Ozone Layer Protection Ordinance

- bans the manufacture of 18 HFCs and establishing a licensing system for their import/export, effective 1 December 2025
- enhanced regulatory powers and penalties support enforcement

India guidelines on recycled PET for FCM

- **Approved Recycling Methods:**
 - Super-Clean
 - Melt-in
 - Paste-in
 - Chemical
- FCM-rPET products must be clearly marked
- **Documentation responsibilities apply to:**
 - Manufacturers
 - Converters
 - Beverage bottlers
 - Food packers
 - FBOs
- Manufacturers must apply for authorization and undergo an annual recycling facility audit



South Korea updates recycling of EEE & vehicles

Expanded Scope of Regulated Products

- Now includes all EEE designed for:
 - $\leq 1,500$ volts DC
 - $\leq 1,000$ volts AC

Broadened Recycling Obligations

- Manufacturers/importers must collect, transfer, and recycle:
 - all covered EEE
 - solar panels

Updated Collection Rules

- Aligns definition of collectable products

Extended Exemption in Batteries

- Exemption now applies to batteries built into any EEE

Stronger Voluntary Reporting Incentives

- Fine reductions available for first-time and repeated self-reported violations

New Annexes Introduced

- Product classification for collection/recycling
- Recycling/collection unit cost by category

Effective Dates

- Annex 2: April 22, 2025
- Most changes: January 1, 2026
- Article 8(1) and Annex 1: January 1, 2028

South Korea drafts update to biocide labeling

General Consumers:

- Make labels easier to read and understand
- Clearly display product types
- Visually emphasize safety information
- Group related label elements together

Manufacturers and Importers:

- Consolidate overly detailed labels
- Allow flexibility for small/low-volume products
- Prevent duplication of information

Other Changes:

- Revise approval number format
- Encourage use of electronic labels (e.g., QR codes)

Comments due: 17 June 2025



Taiwan updates chemical labeling rules

CNS 15030:2025, Classification and labelling of chemicals - General rules

Updates:

- Revision of CNS 15030-28 (Hazardous to the ozone layer)
- Addition of CNS 15030-29 (Desensitized explosives)
- Alignment with the UN GHS 8th edition
- 3 main hazard categories:
 - Physical
 - health
 - environmental
 - subdivided into 29 specific standards

Chemical labels must include:

- pictograms
- signal words
- hazard statements
- precautionary statements
- product name
- hazardous ingredients
- supplier information



Taiwan expands chemicals list



Newly added PFAS:

- 5 PFOS salts/related compounds
- 352 PFOA salts/related compounds

Nonylphenol & Polyethylene Glycol Ether:

- Concentration reduced from 5% to 0.1%
- More isomers/CAS numbers added
- Use prohibitions expanded to include:
 - Industrial detergent manufacturing
 - Textile/leather processing
 - Metal processing
 - Pulp and paper manufacturing

Effective date: 13 May 2025



Vietnam - approval of chemical law

Prohibits

- illegal handling of dangerous chemicals
- unauthorized actions
- withholding or falsifying information
- using banned or unidentified chemicals
- illegally producing or importing
- abusing official or professional authority
- manipulating chemical processes

Chemical classifications

- conditional
- specialized control
- banned

Additional key provisions

- transportation
- storage
- safe use
- waste
- new chemicals
- packaging
- information disclosure
- chemical safety & security
 - ensure infrastructure supports safety
 - provide safety training
 - emergency plans
 - legal safety rules
 - share safety information publicly

Effective date: 1 January 2026

Europe



EAEU revises draft register of chemicals

Updates

- Annexes 1–6: information required for inventory, national registers, public portals, and official sources
- Annex 7: chemicals with CMR and chronic aquatic toxicity (class 1)
- Annex 8: general rules for chemical testing

New chemical notification

- Applications to an authorized national body:
 - chemical safety report
 - supporting documents
- Research strategy if submitting in phases.
- Submissions on paper or electronically
 - translations into national languages
- Refusals for incomplete or inconsistent information

Deadlines

- Information to be submitted by 1 Jan 2026
- Inventory completed by 1 Dec 2026
- National parts completed by 1 Dec 2028

EU REACH updates

Draft proposal to add 2,4-dinitrotoluene

- $\geq 0.1\%$ w/w in articles for public or professional use
- Exemptions: explosives, military/police use, toys, medical devices, food contact materials
- 36 months for use in micro gas generators
- Legacy items not affected

N,N-dimethylacetamide and 1-ethylpyrrolidin-2-one

- Regulated under 2025/1090 (amends Annex XVII of REACH)
- use $\geq 0.3\%$ w/w only permitted if:
 - Safety data sheets and chemical safety assessments are updated to reflect new DNEL values
 - Worker exposure remains below those values

Effective dates:

- 23 Dec 2026 - all industrial sectors
- 23 Jun 2029 - man-made fibre sector (DMAC only)

EU POPs updates

UV-328

Replaces Annex I of 2019/1021

Restrictions:

- 100 mg/kg from entry into force
- 10 mg/kg from 2 years after
- 1 mg/kg from 4 years after

Extended transition period for:

- land-based motor vehicles
- separators in blood collection
- TAC film in polarizers and photographic paper

PFOS UTC Limits

- New UTC limit for PFOS and its salts: 0.025 mg/kg
- Reduced UTC limit for PFOS-related substances: 1 mg/kg
- Align limits with those for PFOA; uses in textiles, leather, semiconductors, etc.

Dechlorane Plus (DP)

Added to Annex I of Regulation 2019/1021

UTC limits:

- 1000 mg/kg for first 30 months
- 1 mg/kg after 30 months
- 5-year exemptions for certain uses

Spare parts exemption applies until end of service life or 31 Dec 2043, whichever comes first

Existing articles may continue use after exemption expires



ECHA proposal to restrict Cr(VI)

Draft hexavalent chromium ban proposed

Exceptions under strict exposure/emission limits:

- Formulation of mixtures
- Electroplating on plastics and metals
- Use of primers/slurries
- Other surface treatments
- Functional additives/process aids

Barium chromate is included to avoid harmful substitutions

6 month consultation opened: 18 June 2025



Ukraine approves chemical registration procedure

Manufacturers/importers to register if a used substance is intentionally released and present at $\geq 10\%$ concentration

Required Documentation:

- Safety Data Sheet (in Ukrainian)
- Hazard classification and labelling
- Identification of hazardous factor similarity
- For biological agents
 - strain passport

Submissions on paper or electronically

- with verified digital ID
- in Ukrainian

Effective Date: 28 May 2025



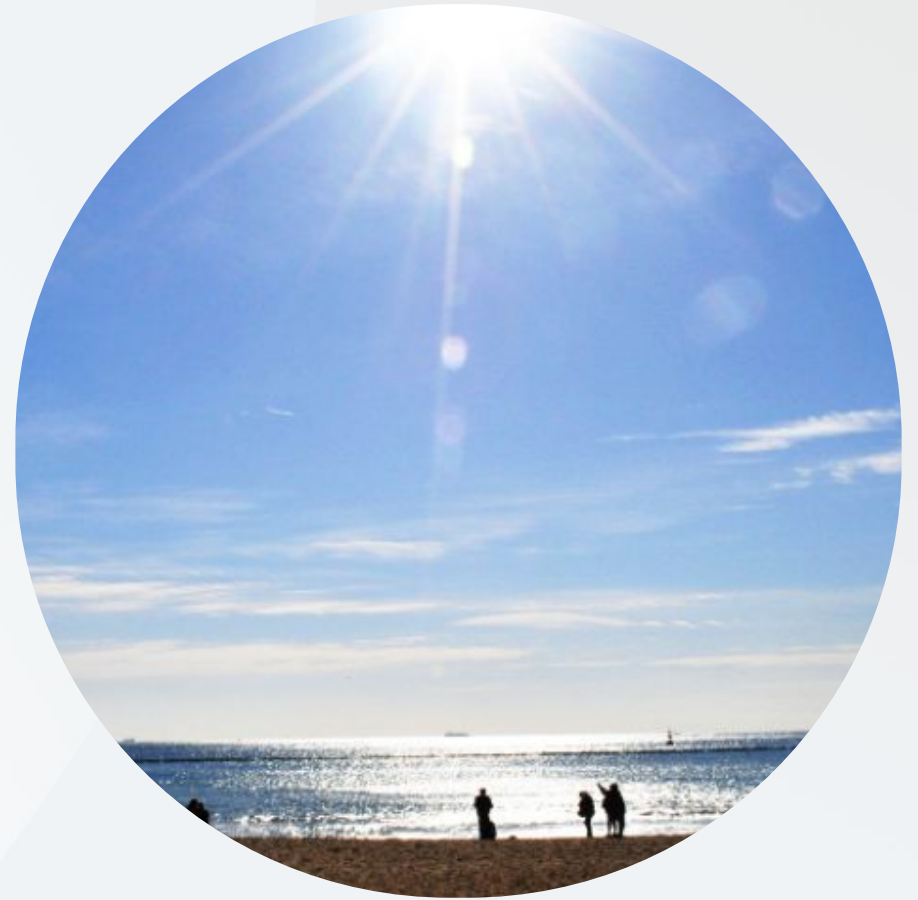
UK rescinds Dechlorane Plus and UV-328 restrictions

S.I. 2025/296 and **S.I. 2025/297** of April 2025 bans Dechlorane Plus & UV-328

S.I. 2025/605 on May 2025 temporarily reverses ban

Response to supply chain disruptions affecting medical tech, automotive, aerospace, and defense sectors.

UK government to review uses and reintroduce restrictions in alignment with the Stockholm Convention.



UK PFAS

EAC PFAS Inquiry

Environmental Audit Committee inquiry into PFAS risks and regulatory adequacy

- Aims to assess UK regulatory strength vs. EU and US
- Likely lead to tighter UK PFAS regulations
- Focus areas include:
 - Monitoring and research capacity
 - PFAS pathways into products and the environment
 - Socioeconomic and geographic distribution of risks
 - Cost-effectiveness of PFAS pollution treatment

Comments due: 26 May 2025

DEFRA's Interim PMT Approach

Policy Paper outlining management of PMT substances under UK REACH

- Key research gaps identified:
 - method to define inherent mobility
 - screening tool for substance prioritization
 - monitoring program for PM substances
- The Environment Agency to develop an improved screening assessment



Questions?



Lets Talk



Cassie Pershyn
Senior Regulatory
Content Specialist,
Content Research
& Development



Kim Plassche
Senior Regulatory
Content Specialist,
Content Research &
Development



Orlaith Morris
Content
Marketing
Manager

