

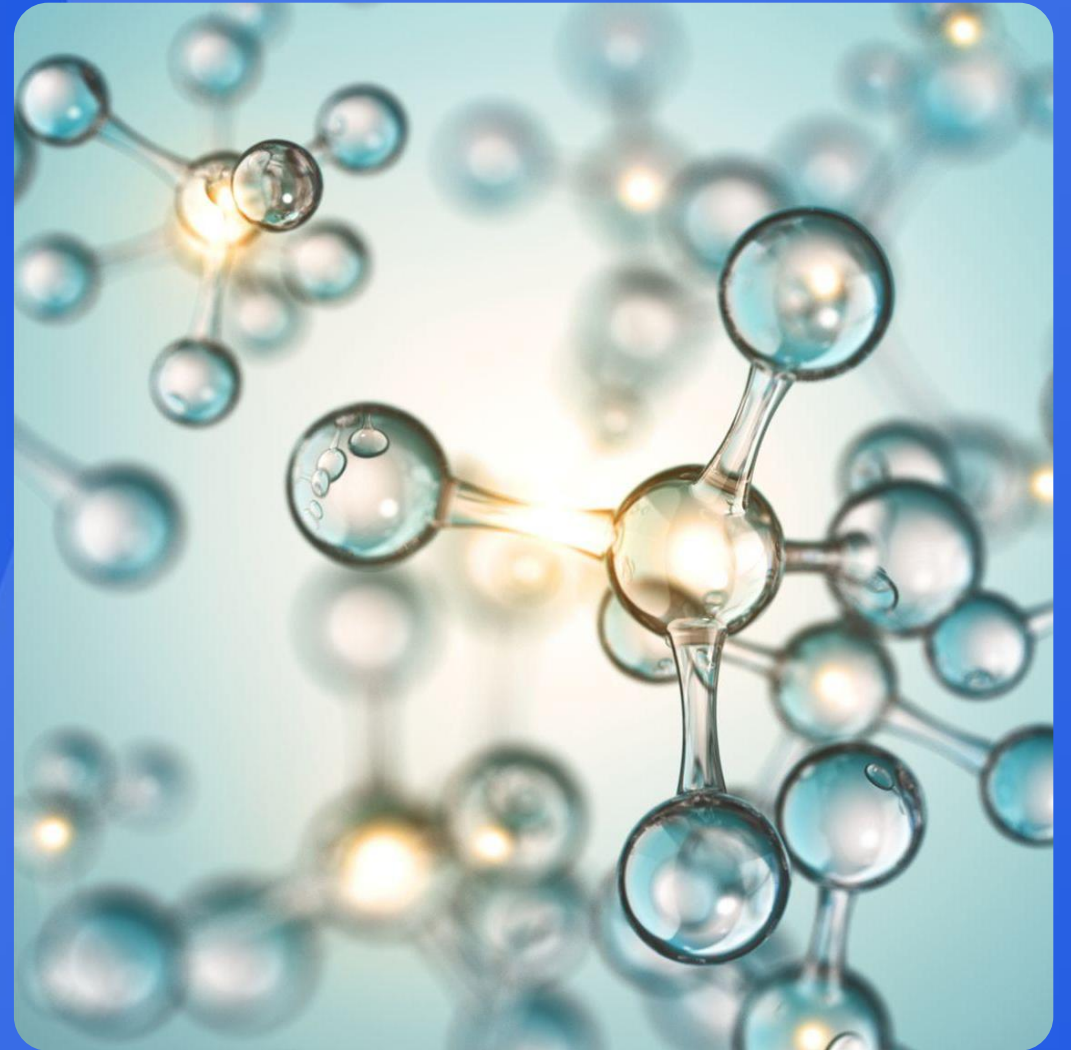


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Webinar

# Chemicals Quarterly *Q3 2025 Regulatory Update*

8 October, 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

# Trusted by the World's Leading Brands

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100K<sup>+</sup>  
Regulations

195  
Countries

10<sup>+</sup>  
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. South America
- 02. North America
- 03. Australia/NZ
- 04. Africa/Middle East
- 05. Asia
- 06. Europe





# South America



# Brazil Reopens Consultation

## Implementation of Law 15.022/2024

- Public consultation reopened 18 July 2025
- No change from May 2025 draft
- Draft regulates registration, risk assessment, and management of chemical substances
- Applies to substances produced or imported  $\geq 1$  ton/year
- Prioritization and risk management outlined

Colombia Deadline Passes

# 2024 Industrial Chemicals

- Deadline to report volumes:  
30 September
- Reporting required in *INSQUI* database





# Peru Enacts Supreme Decree 018-2025

- Technical regulation for sanitary & environmental management of polychlorinated biphenyls (PCBs)
- Applies to all PCB and contaminated stocks/wastes nationwide
- Implements Stockholm Convention obligations
- PCB inventory deadline: 31 December 2025
- PCB elimination: 31 December 2028





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# North America



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# Perchloroethylene



- Reevaluation of December 2024 final rule restricting PCE
- Input requested on exposure limits, workplace protections, and industry-specific impacts, particularly dry cleaning
- Comments closed: 29 August 2025





D4 (Octamethylcyclotetrasiloxane)

# TSCA Evaluation



- EPA draft evaluation finds unhealthy exposure risks for D4 in adhesives, sealants, paints, and coatings
- Seven uses flagged for environmental harm
- Comments close: 17 November 2025



# Significant New Use Rules

## Withdrawn: 23-2.5e

- 18 substances from post-consumer plastic waste, including:
  - Naphtha: heavy catalytic cracked, heavy alkylate, full range alkylate, butane-contg., hydrotreated heavy, light catalytic cracked, light alkylate, and hydrotreated light
  - Clarified oils, catalytic cracked
  - Gas oils hydrotreated vacuum
  - Distillates: hydrotreated heavy, light catalytic cracked, clay-treated middle, hydrotreated middle, hydrotreated light
  - Gases, C4-rich
  - Gases, catalytic cracking
  - Residues, butane splitter bottoms

## Correction to Final Rule: 24-2.5e

- Amends 90 FR 26437 of June 2025
- Page 26440, in the third column, amendatory instructions 1 and 2 for 40 CFR part 9 and their accompanying regulatory text are removed
- Correction effective: 22 August 2025

# Significant New Use Rules, Continued

## Final Rule: 24-1.5e

- 31 new substances added to Subpart E (§§ 721.11894 through 721.11924), including:
  - Sulfonated phenolic resin salt, polymer with acetone-phenol reaction products, formaldehyde and phenol, sodium salt
  - Octadecanamide, N,N-dialkyl, salts
  - Acid N-[4-(4-diarylalkyl)-, carbopolycyclic alkenyl, methyl ester
  - Silica gel, reaction products with alkyl metal salt
  - More, see: *Significant New Use Rules on Certain Chemical Substances (24-1.5e)*

## Final Rule: 24-3.5e

- 33 new substances added to Subpart E (§§ 721.12043 through 721.12076), including:
  - Heptane, 2-methoxy-2-methyl-.
  - Benzenesulfonic acid, alkyl-, compd. with 1,1'-iminobis[2-propanol] (1:1)
  - Isooctadecanamide, N,N-bis(2-ethylhexyl)-.
  - 2-Butanone, oxime, reaction products with trimethoxymethylsilane
  - Alkene, alkoxy-, polymer with alkoxyalkene
  - More, see: *Significant New Uses: Certain Chemical Substances (24-3.5e)*



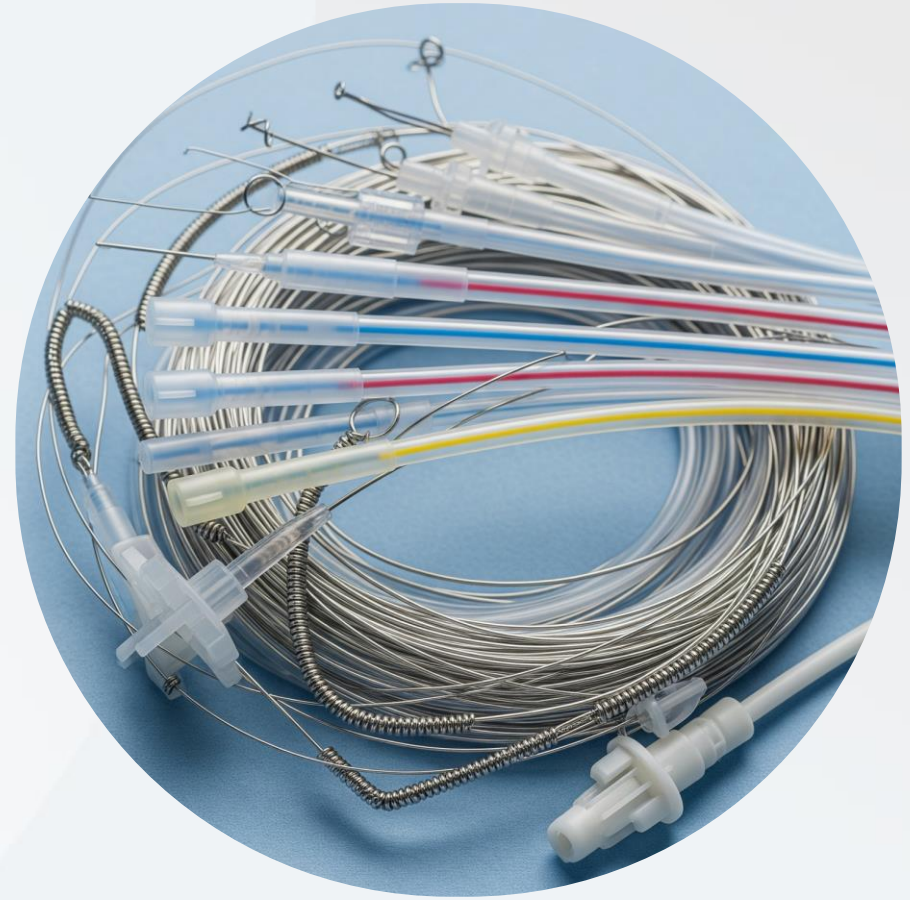
# Interim Order on Aerosol Coatings Emissions

- Compliance deadline extended to 17 January 2027
- Interim final rule issued 2 July 2025
- Comments accepted until 1 August 2025
- Applies to manufacturers, processors, distributors, importers of aerosol coatings



# Fluoropolymers in Medical Devices

- FDA 2025 review finds no patient safety issues linked to PTFE fluoropolymer use in medical devices
- Review based on over 1,800 healthcare providers' data and 1,750+ scientific articles
- FDA distinguishes large-molecule fluoropolymers from smaller, more toxic PFAS



# Aerosol Duster Proposal Withdrawn

- HFC-152a
- HFC-134a
- 18 mg limit on any combination of these
- Comments closed 30 September 2024
- Proposal officially withdrawn 29 September 2025
- Three additional withdrawn rules in the notice
  - Safety Standard Addressing Blade-Contact Injuries on Table Saws
  - Standard for Recreational Off-Highway Vehicles
  - Safety Standard for Fire and Debris-Penetration Hazards



# Alan Reinstein Ban Asbestos Now Act

- Comprehensive ban on manufacture, processing, use, and commerce of all commercial asbestos fibers
- Covers six known asbestos types (chrysotile, crocidolite, amosite, anthophyllite, tremolite, actinolite) plus winchite and richterite
  - Limited chlor-alkali use exemption until 1 January 2030
- President may grant narrow, time-limited national security exemptions
- Aims to close loopholes in EPA's 2024 chrysotile ban rule



# California Bills Pass Legislature

## SB 682: PFAS

- Broad bans on intentionally added PFAS in consumer products
- Cleaning products, juvenile products, food packaging, dental floss, ski wax (1 January 2028)
- Cookware (1 January 2030)
- Exemptions for used products and some components until 2031
- Enforcement through testing, penalties, compliance certification
- Aligns with EU “essential use” concept, signaling systemic phaseout

Signature deadline: 12 October 2025

## AB 823: Microplastics

- Builds on the Plastic Microbeads Nuisance Prevention Law
- Ban of plastic glitter in personal care products, microbeads in non-rinse-off products and in cleaning products (1 January 2029)
- Sell-through until 1 January 2030 for glitter products
- Complements DTSC’s 2025 proposal adding microplastics to Candidate Chemicals List for potential broader product regulation

# Illinois HB 2516 Enacted

- Passed both chambers on 31 May 2025; sent to Governor on 24 June 2025; enacted 15 August 2015
- Bans sale/distribution of select consumer products with intentionally added PFAS starting 1 January 2032
- Products affected: cosmetics, dental floss, juvenile products, menstrual products, intimate apparel



# Maine Proposes PFAS CUU Exemptions

## Chapter 90

### "Currently Unavoidable Uses"

- Rule Chapter 90 amendments proposed 23 July 2025
- PFAS sales ban begins statewide 1 January 2026
- DEP proposes CUU designations to allow limited continued sales until 1 January 2031
  - Cleaning product container internal cartridge valves (HTS 3926.90.4510)
  - Cleaning product container vented cap liners (HTS 3921.19.0000, 7607.20.5000, 3923.50.0000)
- Applies only to specific industrial NAICS sectors
- Manufacturers must notify DEP if relying on CUU exemptions
- Public hearing: 21 August 2025
- Comments due: 2 September 2025





# Toxic Free Kids in Massachusetts

- Bill H.4357 reported favorably 7 August 2025
- Creates new Section 29 in state law
- Prohibits sale of children's products with intentionally added PFAS (measured via total organic fluorine threshold)
- Establishes list of chemicals of concern (carcinogens, PBTs, endocrine disruptors, etc.) updated at least every 3 years
- Creates high priority chemicals list, requiring:
  - Manufacturer reporting within 180 days
  - 3-year phase-out in mouthable items, cosmetics, products for children under 3
  - 5-year phase-out in all children's products absent exemptions



# Minnesota Toxic Free Kids Updated

- Fifth update of Chemicals of High Concern list published 23 July 2025
- Adds 15 new chemicals; *removes 200 chemicals*
- Chemicals present in common consumer products: lead in toys, mercury in skin-lightening products, formaldehyde in detergents
- Mandated updates every three years under Minnesota Toxic Free Kids Act



# PFAS Reporting & Fee Updates

## Minnesota delays reporting deadline 6 months

- MPCA extends initial PFAS reporting deadline from 1 January 2026 to 1 July 2026
- Extension supports supplier agreements and PRISM reporting platform adoption
- HF 2310 bans PFAS in 11 product categories starting 1 January 2025
- Product disclosure program begins 1 July 2026; full PFAS ban starts 1 January 2032
- Exemptions for PFAS in certain internal/electronic components until 1 January 2032 unless CUU
- Juvenile product definitions refined for PFAS prohibitions



# PFAS in Apparel



- NYS DEC held pre-rulemaking webinar on 25 August 2025
- Comments due: 25 September 2025
- Ban on intentionally added PFAS in all new apparel: 1 January 2025
- Additional ban on outdoor apparel for severe wet conditions: 1 January 2028
- “Apparel” broadly defined, excludes professional protective uniforms
- Compliance certifications required from manufacturers, maintained by sellers





# New Authorizations in Canada

- Ministerial Condition No. 22106: bicyclo[2.2.1]hept-5-ene-2-carboxylic acid, 2-[[[(isocyanatophenyl)methyl]phenyl]amino]carbonyloxyethyl ester
  - Component in polymers, coatings, or composites
- Ministerial Condition No. 21984: non-functionalized agglomerated multi-walled carbon nanotubes
  - Used in advanced composite materials, electronics, energy storage, sensors, and as additives to enhance mechanical, electrical, or thermal properties of final products.
- Ministerial Condition No. 22175: 1,3-propanediamine, N-[3-(C11-14-isoalkyloxy)propyl] derivs., C13-rich, acetate
  - Specialized surfactant or modifier, commonly used in the manufacture of lubricants, surfactants, or chemical formulations where tailored solubility and wetting properties are needed

# New Authorizations in Canada, Continued

- Ministerial Condition No. 22269: butanoic acid, 4-[[[(1R)-2-[5-(2-fluoro-3-methoxyphenyl)-3-[[2-fluoro-6-(trifluoromethyl)phenyl]methyl]-3,6-dihydro-4-methyl-2,6-dioxo-1(2H)-pyrimidinyl]-1-phenylethyl]amino]-, sodium salt (1:1)
- Ministerial Condition No. 22270: 1-pyrrolidinecarboxamide, 3-ethyl-4-(3H-imidazo[1,2-a]pyrrolo[2,3-e]pyrazin-8-yl)-N-(2,2,2-trifluoroethyl)-, (3S,4R)-
- Ministerial Condition No. 22274: spiro[6H-cyclopenta[b]pyridine-6,3'-[3H]pyrrolo[2,3-b]pyridine]-3-carboxamide, 1',2',5,7-tetrahydro-N-[(3S,5S,6R)-6-methyl-2-oxo-5-phenyl-1-(2,2,2-trifluoroethyl)-3-piperidinyl]-2'-oxo-, (3'S)-

# Canada Updates Non-DSL & DSL

## Non-Domestic Substances List

- Order 2025-87-07-02
- Order 2025-87-06-02
- Order 2025-87-04-02
- Order 2025-66-04-02
- Order 2025-87-09-02
- Order 2025-66-01-02

## Domestic Substances List

- Order 2025-87-08-01
- Order 2025-87-07-01
- Order 2025-87-06-01
- Order 2025-87-05-01
- Order 2025-87-04-01
- Order 2025-66-07-01
- Order 2025-66-04-01
- Order 2025-112-08-01
- Order 2025-112-07-01
- Order 2025-112-06-01
- Order 2025-112-04-01
- Order 2025-112-09-01
- Order 2025-87-09-01



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# Australia/New Zealand



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# DBDPE & Mercury Bans Finalized

- Schedule 2:
  - Aryl sulfonate hydrotropes
- Schedule 4:
  - Ethane, 1,2-dichloro-
- Schedule 5:
  - Ethane, 1,2-dibromo-
  - Manganese, tricarbonyl
- Schedule 6:
  - Decabromodiphenyl ethane (DBDPE)
  - Mercury and mercury compounds

Effective date: 1 January 2026-2027





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# Africa/Middle East



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# Saudi Arabia - Draft RoHS Updates

## Manufacturer obligations:

- conformity assessments
- declarations of conformity
- technical documentation
- serial production compliance
- product testing
- complaint investigations

## Technical files (in Arabic) to contain:

- declarations of conformity
- risk assessments
- product descriptions
- design documents
- test results
- references to applicable standards

Comments due: 22 August 2025





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# Asia



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# China Draft Chemical Safety Label

## Updates:

- safety information code
- hazard statements
- small packages / folded labels
- simplified labels
- kit packaging

## Chemical safety labels (or QR codes) to include:

- chemical identification
- pictograms
- signal words like "danger" or "warning"
- precautionary statements
- supplier information

Comments due: 12 October 2025



# China - RoHS Standard

GB 26572 applicable to 1500V DC / 1000V AC EEE

Category I (catalogued) = limits & labelling  
Category II (non catalogued) = labeling only

## Labeling:

- EEE labeled with hazardous substances
- products for production to provide information
- label information can be QR code

## Limits of hazardous substances in EEE:

- Lead:  $\leq 0.1\%$
- Mercury:  $\leq 0.1\%$
- Cadmium:  $\leq 0.01\%$
- Hexavalent Chromium:  $\leq 0.1\%$
- Polybrominated Biphenyls:  $\leq 0.1\%$
- Polybrominated diphenyl ethers:  $\leq 0.1\%$
- Dibutyl phthalate (DBP):  $\leq 0.1\%$
- Diisobutyl phthalate (DIBP):  $\leq 0.1\%$
- Butylbenzyl phthalate (BBP):  $\leq 0.1\%$
- Di(2-ethylhexyl) phthalate (DEHP):  $\leq 0.1\%$

Effective date: 1 August 2025

# Japan Drafts PFHxS Ban

- Proposal to add PFHxS to prohibited use list
- Includes products containing PFHxS-related compounds:
  - water / oil-repellent textiles
  - etching agents
  - etchants
  - surface treatment
  - antireflection
  - resists
  - water / oil repellent and fabric protection
  - fire extinguishers
  - water / oil-repellent clothes
  - water / oil-repellent floor coverings

Comments due: 15 October 2025



# Taiwan Drafts PFAS Management Measures

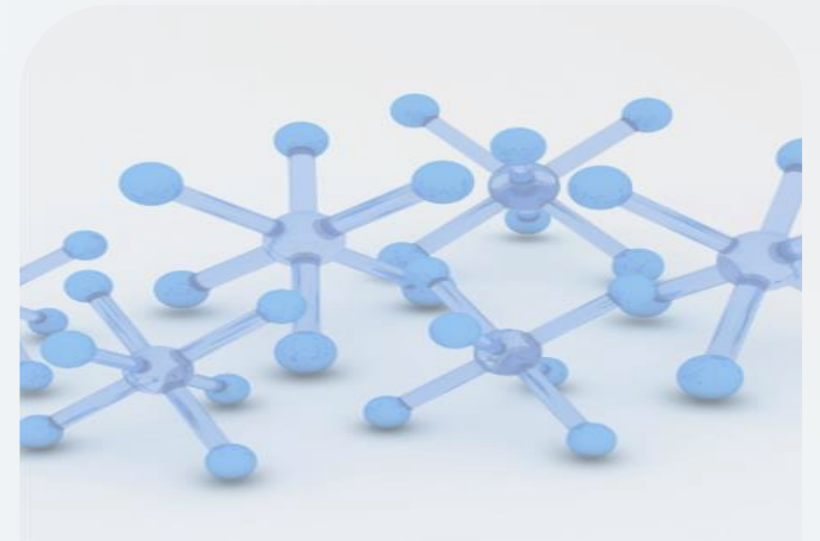
## PFAS substances:

- control concentrations = 0.1%
- tiered thresholds
- PFAS polymers or gases > threshold < 30% must be labeled
- concentrations  $\geq$  30% trigger stricter obligations

## Other provisions:

- follow recognized testing standards
- label relevant products as
  - "fluoropolymer"
  - "perfluorinated polyether"
  - "fluorinated gas" or
  - "hydrofluoroolefin"

Comments due: 7 October 2025





# Uzbekistan RoHS

- Annex 1 EEE substances limits
- alignment with EU RoHS
- exemptions outlined in Annex 3

**Conformity Mark** on product and in documentation to also contain:

- product name, type, and model
- manufacturer's name and/or trademark
- country of origin
- environmental protection measures
- product malfunction information
- month and year of production

**Effective date:** 16 August 2025



# Vietnam - Chemical Law Draft Decrees

## Management of activities and substances in products

- National Single Window for production, trade, storage, import
- chemical registration rules
- foreign inventory recognition
- national chemical list by 2028
- disclosure, labeling, testing, records obligations

## Chemical industry development, safety and security

- national industry strategy
- safety/security for facilities, transport, packaging, labeling
- prevention plans, drills, national database reporting

## Chemical lists

- official chemicals subject to management:
  - key chemicals, restricted/controlled, treaty substances
  - incident prevention thresholds
  - authorized chemical safety training

# Europe



# EU Chemicals Industry Action Plan

## Key measures:

- critical chemical alliance
- trade defense tools
- low energy costs
- clean chemical markets
- innovation hubs
- PFAS restrictions / safe alternatives
- simplification omnibus

## (EC) 1272/2008 (CLP):

- digital contact information
- small package labeling
- fixed deadlines
- relaxed formatting
- digital labelling

## (EC) 1223/2009 (Cosmetics):

- CMR procedures
- ingredients annexes
- derogation requests
- pre-notification obligations
- nanomaterials treatment
- internationally recognized nomenclature

## (EU) 2019/1009 (Fertilizers):

- alignment with REACH
- micro-organisms assessments
- removal of "unbundling clause"
- digitizing in line with broader EU proposals





# EU REACH Updates

## Annex XVII to include new CMRs

- diuron
- tetrabromobisphenol-A
- dimethyl propylphosphonate
- 4-methylimidazole
- phosphonium and organotin compounds

## Call for Evidence

- Proposed SCIP database discontinuation
  - reduced reporting obligations
  - eliminate duplication with REACH requirements

Comments due: 10 September 2025



# EU POPs Updates

## Exemption thresholds for PBDEs:

- tetraBDE
- pentaBDE
- hexaBDE
- heptaBDE
- decaBDE

## UTC PBDE limits in recycled articles:

- 500 mg/kg upon entry into force
- 350 mg/kg as of 30 December 2025
- 200 mg/kg as of 30 December 2027

## For other mixtures and articles:

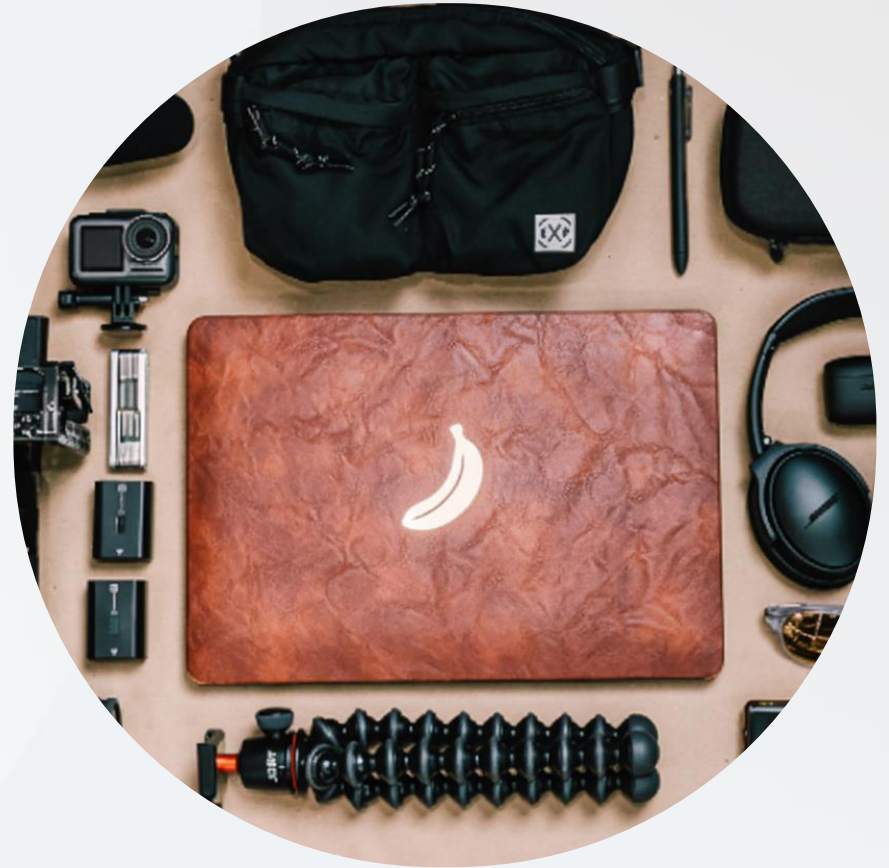
- 10 mg/kg



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## Annex III - use of lead exemptions extended to 2027 for:

- Glass and ceramics
- Solders:
  - continued use of high-lead alloys to 2027
- Lead as an alloy:
  - renewed for:
    - steel = 0.35% permitted to 2027
    - aluminium = 0.4% permitted to 2027
    - copper alloys = 4% permitted to 2027



# EU PFAS Updates

## Expanded sector scope:

- printing
- sealing
- machinery
- medical packaging and excipients
- military uses
- explosives
- technical textiles
- broader industrial applications

Alternative restriction approaches beyond a full ban or bans with time-limited exemptions. These alternatives consider whether PFAS use could be allowed under controlled conditions.





# EAEU Proposal on Polymeric FCM

## Updates

- uniform evaluation
- safety indicators for substances released from FCM including for:
  - wood
  - natural and pressed cork
  - rubber
  - rubber-plastic materials
- labeling requirements

## Product information must be provided and contain:

- name and purpose
- storage & transportation conditions
- disposal possibilities
- processing method
- name and contact of the manufacturer/producer
- name and contact of importer
- date of manufacture
- shelf life

Comments due: 27 October 2025

# France Drafts 2nd PFAS Decree

## Prohibits PFAS from 1 January 2026 in:

- cosmetics
- waxes
- clothing
- footwear
- waterproofing agents

\*Ban extended to all textiles from 2030

Comments due: 5 September 2025

## Prohibitions for trace contaminant PFAS:

- < 25 ppb / individual PFAS
- < 250 ppb / total PFAS
- < 50 ppm / PFAS with polymers

## Exemptions:

- protective clothing / footwear
- PPE waterproofing agents
- technical / essential-use textiles
- industrial applications
- essential purposes

# Türkiye finalizes KKDİK procedures

KKDİK rules clarify chemical registration processes and deadlines

- Key obligations:
  - pre-registration data (pre-MBDF) submission
  - "one substance – one registration" rule
  - joint registration / collaboration
  - support science and advisory groups
  - registration file updates and timelines
  - SDS sheets

Effective date: 12 August 2025



# Türkiye Drafts Procedures for Recycled FCM

- Proposed procedures for food contact materials:
  - producing
  - processing
  - importing
  - decontamination
- Key obligations focus on:
  - safety
  - traceability
  - quality control
  - labelling
  - facility details
  - batch information
  - recycled content %



Comments due: 16 August 2025



# Proposed Transition Extensions

- Option 1: Oct 2029, Oct 2030, Oct 2031\*
- Option 2: Apr 2029, Apr 2031, Apr 2033
- Option 3: Apr 2029, Apr 2030, Apr 2031



# Questions?



# Lets Talk



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