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Asia Product Compliance: Regulatory Trends in Major Markets in 2025

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Table of Contents

Asia Product Compliance: Regulatory Trends in Major Markets in 2025

- 01** **About the Authors**
- 02** **Unlocking Market Access**
- 03** **Introduction**
- 04** **Product Sustainability & Circularity**
- 05** **Product Chemical Restrictions**
- 06** **Product Quality, Safety & Standardization**
- 07** **Digital Product Security & Artificial Intelligence**
- 08** **Conclusion**

01. About The Authors



Giselle Chia
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Giselle is a highly dedicated Regulatory Compliance Analyst focused on guiding multinational clients through the intricate web of global product and ESG regulations. She possesses deep expertise across Taiwan and key ASEAN markets, where she proactively monitors and analyzes regulatory developments, with a primary focus on high-impact areas such as Cybersecurity, Ecodesign, Ecolabeling, and Energy Efficiency. She directly assists clients in overcoming product market access hurdles by converting complex legal and technical requirements into clear, practical implementation strategies.

Having been admitted to the Bar of Ireland after completing her Barrister-at-Law Degree from the Honorable Society of King's Inns, Giselle brings a rigorous, structured, and legally-sound approach to regulatory interpretation. Her foundational experience includes legal research and drafting essential documents during law firm internships.

As a Mandarin native speaker who is also fluent in English, Bahasa Malaysia/Indonesia, and Cantonese, Giselle effectively ensures accurate, nuanced interpretation of foreign-language legal texts relevant to her markets.

01. About The Authors



Lynn Chiam **Regulatory Compliance Specialist,** **Compliance & Risks**

Lynn is a dedicated Regulatory Compliance Specialist on the Global Regulatory Compliance team at Compliance & Risks. She specializes in monitoring and analyzing regulatory developments across key Asian markets - specifically China and Malaysia - and translating these complex global regulations into actionable strategies for clients.

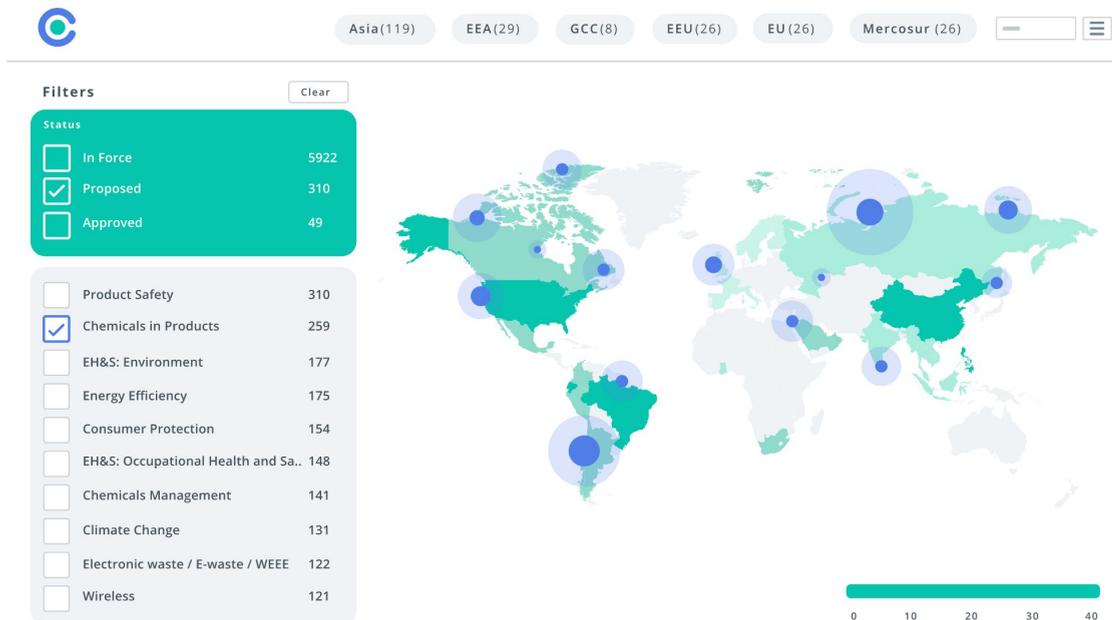
As a subject matter expert, Lynn helps clients with questions on critical topics, including food contact materials, chemicals in products and the transport of dangerous goods. Lynn brings a strong legal foundation to her compliance work, having been admitted to the Bar of Ireland as a graduate of The Honorable Society of King's Inns, and holding a Law undergraduate degree from Letterkenny Institute of Technology.

Prior to joining Compliance & Risks, Lynn worked at law firms, where she conducted in-depth legal research and drafted legal memoranda in civil law matters, providing a robust analytical framework essential for effective regulatory compliance.

Finally, Lynn is also fully competent in English, Mandarin and Malay (Bahasa).

02. Unlocking Market Access

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03. Introduction

The regulatory landscape of product compliance in the Asia region is experiencing significant changes in 2025, primarily driven by a focus on sustainability, chemical management, enhanced safety, digital security and AI governance.

This whitepaper analyzes the notable trends across twelve key markets in Asia, exploring economic giants like China, Japan, South Korea and India, alongside significant players like Hong Kong, Taiwan and Singapore, as well as emerging markets like Indonesia, Malaysia, Thailand, Vietnam and Philippines.

This whitepaper highlights the four main themes for this year's trends and elaborates on the key developments or changes in specified markets:

1. Product Sustainability and Resource Circularity

In 2025, Asia is rapidly transitioning the circular economy from concept to mandatory product compliance, accelerating sustainability and resource circulation. Governments are now enforcing requirements, compelling manufacturers to integrate sustainability into product design and end-of-life management. Key trends include expanded extended producer responsibility (EPR) schemes, design-focused regulations for reusability and recyclability, recycled content mandates, and increasing cooperation with the EU on ecodesign and the Digital Product Passport (DPP). Nations are adopting the circular economy through national action plans or roadmaps and are leveraging product regulations for environmental responsibility with stricter energy efficiency requirements.

2. Product Chemicals Restrictions

The paramount product chemical trend anticipated across Asia in 2025 is the immediate and concentrated restriction of per- and polyfluoroalkyl substances (PFAS) and other persistent organic pollutants (POPs) such as Methoxychlor, Dechlorane Plus and UV-328. These restrictions are frequently mandated directly by the **Stockholm Convention**, to which numerous Asian nations are signatories. In Compliance & Risks' recent whitepaper, [PFAS Under Pressure: Key Trends and Challenges Worldwide](#), the escalating global regulatory response to PFAS was comprehensively

explored. Furthermore, controls governing hazardous substances within electrical and electronic equipment (EEE) are increasingly becoming mandatory, with an expanding substance scope that demonstrates greater alignment with the EU's RoHS Directive. China, in particular, is demonstrating leadership in this regulatory harmonization. Compliance & Risks' blog, [China RoHS Overhaul: Mandatory Standard GB 26572-2025, Expanding Catalogue and Approaching Critical Deadlines](#), provided a summary of the recent evolution of China RoHS and its associated implications. Contrarily, the regulatory trajectory for prohibiting mercury in products throughout the Asia region in 2025 represents a definitive and accelerating phase-out, primarily driven by the legal obligations stipulated within the **Minamata Convention**. Commencing in 2025, territories including China, Japan, Hong Kong, Taiwan, and Singapore are implementing prohibitions on specified mercury-containing products, with stringent deadlines established for complete phase-out in the forthcoming years.

3. Product Quality, Safety and Standardization

The product safety compliance trends in the Asia region in 2025 are characterized by a dominant focus on mandatory third-party certification and a significant expansion of regulatory scope into traditionally unregulated industrial and high-tech sectors.

The current situation is one of accelerating regulatory maturity, where major emerging markets are adopting rigorous compliance frameworks to ensure consumer safety.

4. Digital Product Security and Artificial Intelligence

The digital product trends observed in Asia throughout 2025 are fundamentally shaped by a swift transition toward the implementation of mandatory security-by-design principles for connected products, coupled with the urgent necessity of establishing robust AI governance frameworks. In our preceding whitepaper, [A New Era of Product Cybersecurity: Navigating Regulatory Developments in 2024-2025](#), Compliance & Risks comprehensively examined the evolving global regulatory landscape concerning product cybersecurity.

Specifically, we addressed Indonesia's **draft law on Cyber Security and Resilience (RUU KKS)**, which aims to regulate Products with Digital Elements (PDED); China's **draft mandatory national standard (GB) on Basic Requirements and Test Methods for Consumer Internet of Things Product Security**; and Japan's voluntary labeling scheme for IoT products, which is based on the **Japan Cyber-Security Technical Assessment Requirements (JC-STAR)**.

More recently, China and Taiwan have joined this global momentum to proactively address the escalating number of cybersecurity incidents involving IoT products. Conversely, prominent Asian markets such as Japan and South Korea are demonstrating leadership in the domain of AI governance through the introduction of framework legislation intended to regulate products and services that incorporate AI technologies.



04. Product Sustainability & Circularity

4.1. China

In a clear demonstration of its commitment to environmental protection and resource efficiency, China continued to roll out significant regulatory changes across multiple sectors in 2025. In April 2025, China's State Council published **a decision amending the interim regulation on express delivery** to enforce the green standards for express delivery packaging. The key objective of this decision is to promote resource conservation, reduce waste, and enhance the recyclability of express packaging by establishing mandatory green standards for the high-volume express delivery industry. Key requirements prescribe that businesses are obliged to report their use and recycling of disposable plastic packaging to the postal administration departments, and industry organizations must include these practices within their self-regulatory scope and publish important information to the public without delay.

In October of the same year, China's Ministry of Ecology and Environment (MEE) proposed the **draft standard HJ 527, Technical specification of pollution control of processing waste electrical and electronic equipment**, signaling a significant upgrade to the country's e-waste management regulations by repealing the older HJ 527-2010. The draft standard establishes mandatory technical requirements for pollution control during the entire WEEE life cycle, specifically addressing the storage, disassembly, utilization, and disposal stages. Compared to the 2010 standard, the draft is more detailed, refining pollution control requirements for storage and disassembly, and adding new control requirements for the utilization and disposal of final products. It also clarifies the applicable categories and the list of WEEE in a new Annex A.

In the area of Energy and Water Efficiency, China is expanding its labeling schemes. This includes the publication of the **Catalogue of Products Subject to Energy Efficiency Labeling (2025 Edition)** in September 2025. This revision expands the products requiring mandatory energy efficiency certification. The new 2025 Catalogue now includes a total of 38 product types subject to mandatory labeling, encompassing household appliances (such as refrigerators and washing machines), motors, office equipment (printers and copiers), and commercial products (commercial refrigeration and industrial welding machines). In conjunction with the expanded catalogue, the implementation rules for seven specific product categories have been revised, abolishing previous rules and setting new compliance timelines. These revised rules apply to:

- Household and Similar Use Kitchen Appliances (Electric Induction Cooktop, Electric Rice Cooker, Microwave Oven);
- Permanent Magnet Synchronous Motor;
- Air Purifier;
- Microcomputer;
- Gas Cooking Appliance;
- High-Voltage Three-phase Cage-type Asynchronous Motor;
- Commercial Refrigeration Appliances.

Crucially, the announcement grants a **two-year grace period** for products manufactured or imported before their respective implementation dates, allowing affected industries time to transition and liquidate existing inventory before the new labeling requirements take full effect in 2027 and 2028.

New rules are also being drafted for Water Efficiency labeling in China, in which a draft joint announcement by China's National Development and Reform Commission (NDRC), the Ministry of Water Resources, and the State Administration for Market Regulation (SAMR) introduced the **Catalogue of Products Subject to Water Efficiency Labeling (2025 Edition)**. The new 2025 catalogue proposes to combine and revise existing lists, now covering a total of six product types: toilets, smart toilets, dishwashers, showers, water purifiers, and faucets. Crucially, the implementation rules for toilets, smart toilets, and dishwashers have been revised, effectively abolishing their previous 2020 rules to align with updated standards. Conversely, the rules for showers, water purifiers, and faucets will continue to be governed by their existing, unrevised announcements. To provide ample time for industry transition, the draft sets out staggered implementation dates for the product categories for which implementation rules have been revised, with a **one-year grace period** provided for existing stock.

China is also setting up a robust framework for climate action and carbon footprint by launching a phased introduction of China's **Compulsory Product Certification for Product Carbon Footprint Labeling and Certification**. It established a new national framework for verifying, labeling, and promoting products based on their quantified carbon footprint and ongoing emission reduction efforts. The regulatory process began on March 17, 2025, with the issuance of the **General Implementation Rules (CNCA-CFP-00:2025)** by the Certification and Accreditation Administration of China (CNCA). These foundational rules defined the **"how"** of the system: the general requirements for certification, establishing a system where a certification body verifies a product's carbon footprint consistency with relevant standards and assesses the enterprise's commitment to continuous greenhouse gas emission reduction and/or removal increases. Crucially, the rules stipulate that the certification is valid for a period of two years, and certified enterprises are authorized to use or display the official product carbon footprint label on the product, packaging, and sales platforms, provided the product is included in the CNCA-published catalogue.

Following the foundation of the general rules, the scope of application, or the **"what,"** was defined on **July 11, 2025**, when the China State Administration of Market Regulations (SAMR), along with the MIIT, published the **Product Carbon Footprint Label Certification Pilot Certification Catalogue (First Batch)**. This announcement identified the initial **12 critical product categories** that would be subject to the new mandatory certification system. This targeted list includes key industrial and consumer products such as lithium-ion batteries, photovoltaic modules, room air conditioners, and computers (desktop and laptop).

The final step in the initial framework rollout, operationalizing the system, occurred on September 9, 2025. The Secretariat of the CNCA published an announcement on the issuance of the **First Batch of Implementation Rules (Trial) for Product Carbon Footprint Labeling and Certification**. These rules provide the product-specific details necessary to execute the general requirements set out in CNCA-CFP-00:2025 for every product listed in the pilot catalogue.

By establishing these specific rules for products listed in the catalogue, the CNCA completed the mandatory regulatory chain. This phased approach created a verifiable, national standard for measuring and reporting product life cycle greenhouse gas emissions, significantly enhancing China's green manufacturing and climate governance capabilities.

4.2. Taiwan

National Roadmap on Circular Economy:

Taiwan is ramping up its commitment to a net-zero and fully circular economy future with the release of its draft **"2050 Taiwan Circular Economy Roadmap"**. Centered on core strategies to "Redefine" and "Redesign" its economy, Taiwan sets ambitious goals for 2050 compared to the 2020 baseline:

- Goal 1: Double the economic value generated per unit of resource input;
- Goal 2: Lower per capita material consumption by 35%;
- Goal 3: Raise the input-end circularity rate by 2.5 times.

The roadmap introduces powerful governance tools, including:

- A Dual Circular Governance Framework
 - The **Waste Disposal Act** will be enhanced for stricter control and penalties;
 - The **Resource Recycling Act** will be revised into the **Resource Circulation Promotion Act**.
- New mandates for ecodesign based on the **EU's Ecodesign for Sustainable Products Regulation (ESPR)**
 - The focus will be on the minimization of virgin resources, modularity, durability and reparability.
- Adoption of Digital Product Passports (DPPs) and a Circular Label to enhance transparency
 - The government plans to promulgate the **Regulations for Implementing Product Information Disclosure** in 2026.

Six priority sectors are identified for circular economy demonstration:

- Biomass;
- Plastics & Packaging;
- Textiles;
- High-tech & Electronics;
- Architecture & Construction;
- Energy & Critical Materials.

The draft roadmap is expected to be finalized as early as the end of 2026.

Resource Recycling Act Overhaul - New "Resource Circulation Promotion Act":

Earlier since May 2025, the **Resource Recycling Act** is undergoing significant amendments and being renamed as the **Resource Circulation Promotion Act**, signalling a major pivot from traditional end-of-pipe waste management towards comprehensive resource circulation. Heavily influenced by the **EU's ESPR**, the proposal sets out a framework for the establishment of ecodesign guidelines and/or regulations for products which will focus on various aspects including recycled material content,

repairability, restriction on hazardous substances, energy efficiency, etc. It will also introduce digital product tracking similar to the EU's Digital Product Passport concept, requiring manufacturers, importers or sellers of designated products to disclose key product information. Besides, the proposal seeks to enhance extended producer responsibility to ensure extended product lifespans. Manufacturers, importers or sellers will be explicitly required to provide collection and repair services, minimum warranty period, etc. **WTO Notification G/TBT/N/TPKM/562** suggests that affected product categories include information and communication technology (ICT) products, electrical and electronic equipment (EEE), batteries, textiles, vehicles, tires, and packaging and containers.

4.3. India

For India, a major focus is on consumer clarity and reducing misleading claims through digitalized and transparent labeling.

QR Code on Plastic Carry Bags and Multi-layered Packaging:

On 23 January 2025, the Indian Ministry of Environment, Forest and Climate Change published an amendment to the **Plastic Waste Management Rules**. In relation to the labeling of plastic carry bags and multi-layered packaging, new provisions require producers, importers or brandowners to provide specified information in a barcode or QR code printed on the plastic packaging from 1 July 2025.

QR Code on Battery Products:

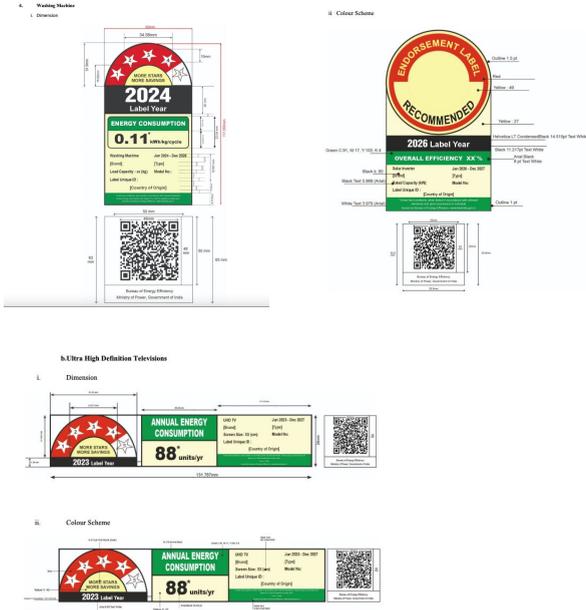
On 24 February 2025, the Indian Ministry of Environment, Forest and Climate Change published an amendment to the **Battery Waste Management Rules**. New provisions require producers to print a barcode or QR code containing the Extended Producer Responsibility registration number on:

- A. Battery or battery pack; or
- B. Equipment having battery or battery pack; or
- C. Packaging of battery or battery pack; or
- D. Packaging of the equipment having battery or battery pack; or
- E. Bulk packaging of batteries or battery packs, not for retail sale.

Energy Efficiency Labeling Overhaul and Use of QR Code:

In July 2025, the Indian Bureau of Energy Efficiency (BEE) proposed a series of new regulations that require labels to feature enhanced details for greater transparency.

Draft Regulations	Descriptions/Key Requirements
Bureau of Energy Efficiency (Appliance Labeling) Regulations, 2025	<p>Establishes a comprehensive framework governing the display of essential information on labels.</p> <p>Applies to:</p> <ul style="list-style-type: none"> ● Refrigerators (Frost Free, Direct Cool, Deep Freezers); ● Room Air Conditioners (Fixed/Variable Speed, Light Commercial, Cassette/Floor Standing/etc., and Chillers); ● Electric Ceiling Type Fan;

Draft Regulations	Descriptions/Key Requirements
	<ul style="list-style-type: none"> Stationary Storage Type Electric Water Heater; Televisions (Color and Ultra High Definition); Washing Machines; Lighting (Tubular Fluorescent Lamps, Self-Ballasted Lamps); Distribution Transformers; Solar devices (Grid Connected Solar Inverter, Solar Photovoltaic Modules). <p>The label must include a QR code.</p>
<p>Bureau of Energy Efficiency (Label Particulars) Regulations, 2025</p>	<p>Specifies the label particulars. Examples:</p>  <p>The image shows two examples of energy labels. The first is for the 2024 Label Year, featuring a green background with a red starburst graphic and a QR code. The second is for the 2026 Label Year, featuring a yellow background with a red starburst graphic and a QR code. Both labels include technical specifications and a QR code for verification.</p>
<p>Bureau of Energy Efficiency (Labeling Compliance) Regulations, 2025</p>	<p>Establishes a robust mechanism for ensuring the accuracy and authenticity of labels affixed to appliances or equipment.</p>
<p>Bureau of Energy Efficiency (Labeling Fees) Regulations, 2025</p>	<p>Establish a framework for the levy and collection of fees from permittees of Mandatory and Voluntary appliances.</p>

4.4. Japan

Strengthened Resource Circulation:

On 4 June 2025, the Japanese Cabinet approved a number of amendments to the **Promoting the Transition to a Decarbonized Economic Structure Act** and the **Promotion of Effective Utilization of Resources Act** which would establish a new system for strengthening resource circulation, effective **1 April 2026**.

The new system focuses on four key aspects:

Focus Points	Descriptions/Requirements
Mandatory use of recycled resources	<ul style="list-style-type: none"> • Specific products requiring recycled materials will be designated. • Manufacturers of designated products will be required to submit and periodically report plans for the use of recycled materials.
Promotion of environmentally conscious design	<ul style="list-style-type: none"> • A certification system for environmentally conscious designs that promote effective resource utilization and decarbonization will be established. • Benefits for certified businesses: <ul style="list-style-type: none"> ○ Labeling for certified products. ○ Financial support for investments in recycling equipment.
Promotion of raw material recycling for Green Transformation (GX)	<ul style="list-style-type: none"> • Special provisions under the Waste Management and Public Cleansing Act will be made for manufacturers with high collection targets. • Benefits for businesses: <ul style="list-style-type: none"> ○ Exemptions from business licensing. ○ Incentives for collecting and recycling materials.
Promotion of circular economy commerce	<ul style="list-style-type: none"> • New categories of circular economy commerce businesses will be defined. • Standards for these businesses to meet in terms of resource utilization will be established.

Mandatory Use of Recycled Plastics in Designated Products:

To align with these amendments, the **Enforcement Order for the Act on the Promotion of Effective Utilization of Resources** is also being amended. The Ministry of Economy, Trade and Industry (METI) issued a draft order in July 2025, introducing a new category of products to be designated as "Specified Decarbonization Recycled Resources Utilization Promoted Products". The purpose of this designation is to promote the use of recycled plastics as decarbonization recycled resources. Manufacturers and importers of designated products will be required to formulate plans for using recycled resources and submit regular reports to the government. These obligations will apply to companies that meet specific production or import thresholds. Target products to be included in the new category are:

- Plastic containers and packaging;
- Automobiles;
- Unit-type air conditioners;
- Television receivers;
- Electric refrigerators;
- Electric washing machines.

If adopted, the amendments will also take effect on **1 April 2026**.

4.5. South Korea

Circularity in Product Design and Manufacturing:

On 10 March 2025, the National Assembly proposed a draft law which would amend the existing **Resource Circulation Framework Act** and explicitly require producers to consider sustainability and circularity in product design and manufacturing. Specifically, businesses engaged in the production of raw materials such as paper, glass, and metal, as well as those producing or importing products such as plastics, are mandated to expand the use of circular materials and transition to eco-friendly materials while considering product circularity.

Repairability and Sustainable Use of Products:

On 30 July 2025, the South Korean Ministry of Environment proposed a draft notice for the **List of Target Products for Sustainable Product Use** to implement the newly established Article 20 (Use of Sustainable Products) of the **Resource Circulation Framework Act**. It aims to designate products that producers or importers must ensure are not prematurely discarded and can be repaired and used sustainably. The target products are manufactured goods listed in **Annex 3 of the Consumer Dispute Resolution Standards** that have a parts retention period of 3 years or more. This covers a wide range of products including but not limited to:

- Transportation and Machinery
 - Automobiles, motorcycles, boilers, etc.
- Home Appliances, Office Equipment, Telecommunications, and Optical Instruments
 - Televisions, refrigerators, air conditioners, microwave ovens, washing machines, clothes dryers, vacuum cleaners, DVD players, smartphones, cooking appliances, etc.

Right to Repair (R2R):

Unlike the EU and some US states which have adopted legislation further strengthening consumers' right to the repair of goods (**e.g. EU's Right to Repair Directive, California's Right to Repair Act**), Asia is generally in the early stages of discussion and proposal on R2R legislation. South Korea, being one of the pioneers in this aspect, has proposed a draft law on 15 September 2025 to promote the sustainable use of products by clearly guaranteeing the consumers' right to repair. This draft law is an amendment to the existing **Resource Circulation Framework Act** and mandates producers or importers of products to provide repair information and manuals. A repairability rating system will be established, requiring products to obtain a rating classification and be labeled accordingly.

Mandatory Use of Recycled Plastic Materials:

Another focus of the South Korean government is the mandatory use of recycled plastic materials. On 26 February 2025, the Environment and Labor Committee of the National Assembly proposed an amendment to the existing **Promotion of Saving and Recycling Resources Act**. The proposal seeks to add new provisions under Article 33-3 of the Act, requiring manufacturers of designated products and containers to incorporate recycled plastic materials at a certain minimum percentage. The Ministry of Environment is responsible for determining and announcing the scope of applicable recycled materials, mandatory usage ratios, reporting requirements on usage performance, and other necessary details. On 9 April 2025, the Ministry of Environment proposed a draft notice to establish the operational guidelines for the mandatory use of recycled plastic materials. Obligated users (i.e. manufacturers of designated products) have several obligations, including to use recycled plastic materials at or above the specified mandatory usage ratios, submit an implementation plan, and report the implementation results.

4.6. Indonesia

National Roadmap on Circular Economy:

Earlier on 3 July 2024, Indonesia launched their **National Roadmap and Action Plan for Circular Economy**, outlining their strategies for transitioning from a linear economy to a sustainable circular economy between 2025 and 2045. The plan is structured around three core policy directions, implemented through the 9R Framework (Refuse, Rethink, Reduce, Reuse, Repair, Refurbish, Remanufacture, Repurpose, Recycle, Recover):

- Reduction in Resource Use (R0-R2);
- Extension of Product and Material Use (R3-R7);
- Enhancement on Recycling and Recovery of Post-Production and Consumption Waste (R8-R9).

The roadmap identifies five priority sectors:

- Food;
- Retail (with a focus on plastic packaging);
- Electronics;
- Constructions;
- Textiles.

The core strategies for the retail/plastic packaging sector include:

- Redesign and increase recycled content of plastic packaging;
- Management of bioplastic packaging;
- Development of reusable packaging ecosystem;
- Enhancement of plastic packaging collection, recycling, and recovery.

The core strategies for the electronics sector include:

- Development and implementation of extended producer responsibility (EPR) policy for electronic products;
- Development of circular economy infrastructure;
- Application of ecodesign and product innovation;
- Development of circular economy ecosystem for new technologies and battery of electric vehicles (KBLBB).

The core strategies for the textiles sector include:

- Development of infrastructure and strengthening of circular economy ecosystem for textile sector;
- Reduction of textile waste;
- Enhancement of resource efficiency in textile production processes.

In the first 10-year period (2025-2034), the government plans to establish specific circular economy regulations and guidelines.

4.7. Philippines

Circular Economy and Single-Use Plastic Ban:

In the absence of an enforceable circular economy focused framework legislation, the Philippines has proposed a variety of bills overlapping the topics of circular economy and single-use plastics. In 2025, at least a total of 5 bills aims for the promotion of a circular economy, as well as enhanced waste reduction and reuse (**e.g., Senate Bill No. 306 of 9 July 2025 - Philippine Circular Economy Promotion Act; House Bill No. 2947 of 4 August 2025 - Enhanced National Waste Reduction and Reuse Act**).

Approximately 15 bills are specifically focused on banning the manufacture, import, and use of single-use plastics and related products nationwide, as well as imposing excise tax to address the environmental harms caused by plastic waste (**e.g., House Bill No. 2595 of 30 July 2025 - Single-Use Plastic Products Regulation Act; House Bill No. 4092 of 27 August 2025 - Nationwide Ban on Single-Use Plastics Act; Senate Bill No. 1472 of 3 November 2025 - Single-Use Plastic Bags Tax Act**). While progress remains halted with most of the proposals, the efforts indicate that the Philippines is taking first steps to transition to a circular economy amidst international trends. The government puts significant emphasis on single-use plastics and their products by seeking to impose a total ban on their manufacture, import and use, and possibly excise tax to address the environmental harms caused by plastic waste.

Right to Repair (R2R):

Interestingly, the Philippines House of Representative has introduced a bill in October 2025 proposing to enact a law that promotes and strengthens the consumers' right to repair digital electronic products (**Right to Repair Act**). It mandates original equipment manufacturers (OEMs) to make the following available to owners and independent repair providers:

- Diagnostic and Repair Information
 - Repair technical updates, schematic diagrams, updates, corrections to embedded software, and safety and security patches;
 - Must be free of charge or for no more than what the OEM would charge an authorized repair provider;
 - Must be in the same format that the OEM would use to provide to an authorized repair provider.
- Diagnostic and Repair Tools
 - All diagnostic repair tools with the same diagnostic, repair, and remote diagnosis capabilities available to the OEM's repair staff or authorized repair provider;
 - Must be available for sale upon fair and reasonable terms.

4.8. Vietnam

The **Draft Decree** proposed by the Ministry of Agriculture and Environment on June 19, 2025, signals Vietnam's imminent adoption of an **Extended Producer Responsibility (EPR)** system. This mandate will impose stringent recycling and waste treatment obligations on manufacturers and importers of specific products and packaging, marking a major legislative step towards a circular economy model.

The proposal requires affected businesses to comply with three core obligations:

Obligation	Key Requirements	Deadline
Recycling Targets	Manufacturers and importers must meet mandatory recycling ratios for products and packaging listed in Appendix I. Methods include self-recycling, hiring recyclers, or authorizing intermediaries.	Annually
Registration/Reporting	Businesses must register their recycling plan for the previous year's products/packaging and report the recycling results.	Before April 1st Annually
Financial Contributions	Contributions must be paid to the Vietnamese Environmental Protection Fund to support general waste treatment activities for products like textiles, non-biodegradable plastics, toys, and disposable batteries (listed in Appendix II).	Payment by April 20th Annually

The scope of mandatory recycling is exceptionally broad, covering:

- **Packaging:** A comprehensive range including paper, aluminium, metal, glass, and all major plastic types (PET, HDPE, LDPE, PP, PS, PVC, EPS).
- **WEEE (Electrical and Electronic Equipment):** Major appliances such as refrigerators, washing machines, IT devices (computers, monitors, phones, tablets), compact light bulbs & fluorescent light bulbs, and solar panels.
- **Batteries:** Lead-acid and other rechargeable and non-rechargeable batteries.
- **Vehicles:** Cargo, specialized cargo, and passenger vehicles.

Exemptions are provided for goods meant for export, temporary import or re-export, R&D, and for small producers with annual revenue below 30 billion VND. This EPR system was anticipated to take effect sometime in 2025, requiring immediate attention from all impacted companies. However, this regulation remains in draft form at the time of publication of this whitepaper.

In addition, a **Draft Circular**, issued by the Vietnamese Ministry of Science and Technology (MOST) on September 13, 2025, establishes rigorous regulations for the **import and processing activities** related to used Information Technology (IT) products that are specifically included on Vietnam's **List of Used IT Products Prohibited for Import**. The overarching goal of this regulation is to tightly control the flow of potentially hazardous or environmentally unsound IT equipment, thereby mitigating e-waste and upholding national environmental standards.

This Draft Circular stipulates that these otherwise prohibited used IT products may only be imported under strictly limited conditions. Permitted purposes include essential, non-commercial activities such as research, analysis, fulfilling warranty obligations, or servicing contracts. Crucially, any such import must not pose an environmental risk and must strictly adhere to Vietnam's existing environmental protection laws.

To enforce these import controls, importers and entities engaging in contract-based processing or repair for overseas parties must seek explicit approval from the Minister of Science and Technology, leveraging templates attached to the proposal. Furthermore, approved businesses are subjected to strict reporting requirements, including submitting detailed information on product quantity, usage status, and ultimate disposal actions. Entities with existing authorizations may continue their operations until their current approval expires, but must eventually transition to compliance with the new circular. This regulatory framework ensures that any handling of restricted used IT equipment is transparent, traceable, and subject to close governmental oversight.

Additionally, a **Draft Decree** published by Vietnam's Ministry of Industry and Trade (MOIT) on September 13, 2025, details the implementation of the amended **Law on Economical and Efficient Use of Energy (Law No. 77/2025/QH15)**. This comprehensive proposal establishes the framework for national energy statistics, supervision, and inspection, affecting all organizations and individuals that use energy in Vietnam. The decree supersedes the existing Decree No. 21/2011/ND-CP.

Notably, chapter VI details an expanded energy labeling regime for energy-using vehicles, equipment, and construction materials. The proposal introduces three specific label types: a comparison label (for consumer choice), a confirmation label (for highly efficient products), and a vehicle energy label (for consumption level). Manufacturers and importers must submit a disclosure dossier for labeling, including technical specifications and test results, and are required to provide annual reports on the types and quantities of their labeled products. Full implementation of this labeling system will be accompanied by further regulations from the MOIT and the Ministry of Science and Technology (MOST), including the submission of a specific phase-out list of inefficient vehicles and equipment, and the announcement of **Minimum Energy Efficiency Levels (MEELs)** in national standards.

4.9. Thailand

The Thai Department of Industrial Works is advancing a major regulatory overhaul with the proposal of a new **Draft Law on Industrial Waste Management**, announced on 3 March 2025.

The draft seeks to introduce clear definitions for waste types (Industrial, Electronic, Hazardous Industrial, Automotive) and centres on the **"cradle-to-grave" responsibility** principle, holding the generator accountable until final disposal, including the actions of subsequent handlers. It strictly limits industrial waste imports, permitting them only as raw materials with explicit Director-General approval.

Management provisions and licensing differ by waste type:

- **Hazardous Industrial Waste:** Requires a generator license; collectors, transporters, and disposers need a license (up to three years).
- **Non-Hazardous Industrial Waste:** Requires notification to officials instead of a license.
- **Electronic Waste (E-Waste):** Prohibits illegal discard/improper management; mandates delivery to designated centres/licensed disposers, who require separate licenses.
- **Automotive Waste:** Prohibits abandonment of end-of-life vehicles. Manufacturers are responsible for the entire vehicle lifecycle until disposal; disposers must be licensed.

Finally, the draft proposes a Sustainable Industry Fund to finance environmental measures, support target industries, prevent/remediate damage, and cover costs for investigating environmental wrongdoings. Please note that this draft is currently a proposal at the time of this whitepaper publication.

Moreover, Thailand is set to implement mandatory, updated **energy efficiency standards for room air conditioners**, reflecting a move toward stricter performance requirements and broader applicability.

The foundation for this change was laid by the Thai Ministry of Industry's **Announcement No. 7074**, which was adopted on 27 February 2023 and published on 29 May 2023. This Announcement established the new standard, **TIS 2134-2565** (Room Air Conditioners – Energy Efficiency), effectively replacing the previous TIS 2134-2553. TIS 2134-2565 applies to air conditioners used for rooms with up to 18,000 W cooling capacity, covering single-phase (up to 250 V) and multi-phase units (up to 600 V), certain small air-ducted units, and component parts (condensing and fan coil units). It is compatible with all refrigerants except HCFC-22.

The standard became mandatory on 4 April 2025, when a Ministerial Regulation mandated that all room air conditioners must comply with the TIS standard. The Regulation provides a one-year transition period, with the compliance requirement entering into force on 4 April 2026.

4.10. Hong Kong

On August 1, 2025, Hong Kong enacted major amendments to the **Product Eco-Responsibility Ordinance (Cap 603) and the Waste Disposal Ordinance (Cap 354)**, creating a unified, expanded producer responsibility framework. A new Schedule 12 in the Product Eco-Responsibility Ordinance facilitates the phased inclusion of products under mandatory Producer Responsibility Schemes (PRSs), subjecting them to stricter regulation across distribution, consumption, recovery, and disposal.

Key obligations for registered suppliers of Schedule 12 products include strict product marking (barcode/logo), detailed returns on quantities, and annual audit reports. Retailers must ensure compliance, set up registered return points, and offer a prescribed rebate for returns. Non-compliance carries penalties. The existing plastic shopping bag regulation is repealed and integrated into this broader new PRS structure.

The amendments also tighten waste management via new controls under the Waste Disposal Ordinance. Licensing is now mandatory for disposal facilities handling plastic waste, liquid carton waste, EV battery waste, and vehicle tyre waste (covering treatment, reprocessing, and recycling). Additionally, a permit system controls the import and export of liquid carton waste and vehicle tyre waste. This dual approach - expanding producer responsibility and tightening waste regulation - signals Hong Kong's commitment to enhancing its circular economy and environmental management.

4.11. Singapore

On March 3, 2025, the Singapore National Environment Agency (NEA) launched a **public consultation to address the implications of the European Union's new EU Waste Shipments Regulation 2024/1157**. This regulation updates export requirements for non-hazardous, 'green-listed' waste destined for non-OECD countries, prompting Singapore to proactively assess the impact on its regional waste trade and local industries.

The core changes in the EU Regulation, effective May 21, 2027, are:

- **Consent Requirement:** EU waste exports to non-OECD countries will be conditional upon the importing country formally communicating its consent to the European Commission and demonstrating its sustainable waste management capacity.
- **Facility Licensing:** Authorized green-listed waste exports must only be processed at licensed recovery facilities, or facilities conducting interim operations for further recycling at licensed facilities, within the authorized importing country or other EU-approved nations.

Particular focus is placed on plastic waste, with the Regulation introducing stringent new rules:

- **Transitional Phase for Clean Plastic Waste:** Exports of clean, non-hazardous plastic waste (Basel Convention) to non-OECD countries will first require a "prior notification and consent procedure" from May 21, 2026, to November 20, 2026.
- **Export Ban:** This will be followed by a complete ban on such exports from the EU to non-OECD countries, effective from November 21, 2026, until May 21, 2029.
- **Post-Ban Resumption:** After the interim ban, non-OECD countries may formally express their willingness to resume these imports.
- **Hazardous Waste:** Exports of hazardous waste from the EU to non-OECD nations remain prohibited.

Given these significant shifts in global waste movement, the NEA's consultation is vital for gathering industry perspectives on the appropriate classification of green-listed waste streams and evaluating the potential operational and business effects of an impending EU export ban across various waste types.

Moreover, Singapore's commitment to energy conservation is highlighted by the expansion of its regulatory framework under the mandatory energy efficiency regulations under the **Energy Conservation Act (ECA) to include Commercial Storage Refrigerators (CSRs) and Water Heaters (WHs)**.

According to **Circular NEA-LSD-CIRCULAR-ECA-00002-2025**, manufacturers and importers (suppliers) of these products must adhere to the Minimum Energy Performance Standards (MEPS) and the Mandatory Energy Labeling Scheme (MELS). This compliance includes mandatory registration of both the supplier company and the specific appliance models with the NEA.

In addition to energy efficiency, new technical and safety obligations are imposed:

- **Water Heaters (WHs):** Suppliers must ensure that test reports for instantaneous models do not report a Uniform Energy Factor (UEF) greater than 1 or a recovery efficiency exceeding 100%. Reports showing non-compliance will require retesting.
- **Commercial Storage Refrigerators (CSRs):** A strict safety measure dictates that CSR models containing 150 grams or more of flammable refrigerants will only be approved for supply if the supplier obtains explicit written approval from the Singapore Civil Defence Force (SCDF).

In addition to regulating the new product categories, the NEA has concurrently updated the MEPS requirements for several existing regulated goods. These revisions now encompass advanced technologies, specifically targeting all 8K televisions (those with a resolution of 33,177,600 pixels), single-phase split-type air-conditioners (including single-phase VRF systems), and household refrigerators. This comprehensive update reinforces Singapore's commitment to energy conservation and sustainability across both the residential and commercial sectors.

Besides that, the Singaporean Ministry of Sustainability and the Environment has adopted an **Order amending Order No. S 747/2017 under the Energy Conservation Act 2012 (ECA)**, effective April 1, 2025. This amendment significantly expands the scope of regulated products by adding Water Heaters and Commercial Storage Refrigerators (CSRs) to the list of goods subject to mandatory energy efficiency standards. The order provides precise technical definitions for these new categories. Water Heaters are specified to include electric instantaneous (up to 12kW), electric storage (up to 12kW and 500L), gas instantaneous (up to 59kW), and heat pump water heaters (up to 6kW and 500L), excluding solar-powered models. CSRs are defined as insulated vapor compression appliances intended for non-household food storage (maintaining temperature between - 18°C and 5°C) and are explicitly differentiated from display or customer-access units.

The introduction of these new categories mandates that all regulated water heaters and CSRs supplied in Singapore must comply with registration, labeling, and energy efficiency testing requirements from the effective date. However, to facilitate an orderly market transition, the amendment order provides a one-year grace period. Specifically, products that were manufactured, imported, or planned for manufacture before **April 1, 2025**, will be exempted from the new ECA requirements until **March 31, 2026**. This transitional provision is designed to allow suppliers and retailers sufficient time to clear existing stock while preparing for the full compliance of all newly manufactured and imported models.

4.12. Malaysia

Malaysia has enacted a new regulatory structure for energy management and efficiency, stemming from the **Energy Efficiency and Conservation Act 2024 (Act 861)** and immediately followed by the **Energy Efficiency and Conservation Regulations 2024 (P.U. (A) 466)**. The Regulations were made on December 23, 2024, and officially commenced on January 1, 2025. The framework governs buildings (such as office buildings) and their responsible persons. A person in charge of a building must apply annually for an Energy Intensity Label and must ensure the building's performance is maintained at an Energy Efficiency Rating of not lower than two stars.

For Energy-Using Products (EUP), the law also dictates that no person shall sell or distribute an applicable EUP unless the product meets Minimum Energy Performance Standards (MEPS) of not lower than the two-star rating and is affixed with an energy efficiency rating label. Manufacturers and importers must be registered with the Commission and obtain a Certificate of Energy Efficiency (CEE) for the product.



05. Product Chemical Restrictions

5.1. China

China is implementing two major regulations on chemicals used in refrigeration and insulation to meet its obligations under the **Vienna Convention** and the **Montreal Protocol**, simultaneously addressing climate change and ozone depletion.

Key Regulatory Changes:

- HFC Phase-Out in Refrigeration (Effective January 1, 2026):**
 - **Scope:** Bans the production of household refrigerators and freezers that use Hydrofluorocarbons (HFCs), which are potent greenhouse gases, as refrigerants.
 - **Impact:** Applies to all standard household units, including those for export.
 - **Exclusion:** Vehicle-mounted refrigerators are explicitly excluded.
- HCFC Phase-Out in Polyurethane Foam (Phased Ban from January 1, 2026):**
 - **Scope:** Prohibits the use of 1,1-dichloro-1-fluoroethane (HCFC-141b), an ozone-depleting substance, as a foaming agent in polyurethane products.
 - **Implementation Phases:**
 - **Phase 1 (From January 1, 2026):** Bans the production of combined polyether and polyurethane products that use HCFC-141b. (Prohibitions for finished products like refrigerators, freezers, and electric water heaters were already established in earlier announcements.)
 - **Phase 2 (From July 1, 2026):** Extends the ban to the production of spray polyurethane foam products using HCFC-141b, covering materials used on-site for insulation and waterproofing in construction.

Perhaps the most critical product compliance update in China is the restructuring of China RoHS. The new mandatory standard, **GB 26572-2025**, sets the new baseline for restricted substances in Electrical and Electronic Products (EEP). This is coupled with an expansion of the **Draft Catalogue for the Standard Compliance Administration** and **adjustments to conformity assessment limits**, significantly broadening the scope and stringency of enforcement. More information can be found in this blog "[China RoHS Overhaul: Mandatory Standard GB 26572-2025, Expanding Catalogue and Approaching Critical Deadlines](#)".

Similarly, the Chinese Ministry of Ecology and Environment (MEE) published a **Draft Announcement** on November 7, 2025, to implement the approved amendments to **Annex A and Annex B of the Minamata Convention on Mercury (Decision 5/4 of COP5)**. This regulation focuses on controlling 12 specific types of mercury-added products and the use of mercury in polyurethane production.

The core of the draft is to set phased prohibitions on the production and import/export of these products, based on their use case and technical specifications. It also mandates the prohibition of mercury-containing catalysts in the production of polyurethane and prevents the incorporation of any banned mercury-added products into assembled goods. Products used for **research**, calibration, or reference standards are generally exempt from the prohibitions unless specified otherwise.

Prohibitions on Production and Import/Export of Mercury-Added Products:

Product Category	Specific Products Banned	Deadline
Batteries & Cosmetics	Button cell zinc-silver oxide and zinc-air batteries (Mercury content < 2%).	December 31, 2025
	Cosmetics, including skin lightening soaps and creams (with limited exceptions for eye preservatives or trace contaminants).	December 31, 2025
Measuring Instruments	Very high-precision capacitance/loss measuring bridges; high-frequency radio-frequency switches/relays for monitoring instruments (excluding R&D, maximum mercury content of 20mg per unit).	December 31, 2025
Fluorescent Lamps (CFLs)	Compact fluorescent lamps (CFLs) over 30 watts.	December 31, 2026
	Non-integrated ballast CFLs ≤ 30 watts (single lamp ≤ 5 mg of mercury).	December 31, 2026
Fluorescent Lamps (Halophosphate)	Straight linear lamps (halophosphate phosphor) ≤ 40 watts (single lamp ≤ 10 mg of mercury).	December 31, 2026
	Straight linear lamps (halophosphate phosphor) > 40 watts.	December 31, 2026
	Non-linear fluorescent lamps (U-shaped/circular) using halophosphate phosphor (all wattages).	December 31, 2026
Fluorescent Lamps (Triband)	Straight linear lamps (triband phosphor) below 60 watts, < 5 mg of mercury per lamp.	December 31, 2027

Product Category	Specific Products Banned	Deadline
	Straight linear lamps (triband phosphor) \geq 60 watts and mercury content $<$ 5 mg of mercury per lamp.	December 31, 2027
	Straight linear lamps (triband phosphor) \geq 60 watts and mercury content $>$ 5 mg of mercury per lamp.	December 31, 2027
	Non-linear fluorescent lamps (U-shaped/circular) using triband phosphor (all wattages).	December 31, 2027

5.2. Taiwan

Taiwan is effectively targeting distinct, high-impact substances - ozone depleting and climate-warming HFCs, the "forever chemicals" PFAS, other POPs and mercury.

Regulation of HFCs:

Aligning with the **Kigali Agreement**, the newly promulgated **Regulations on Hydrofluorocarbons Management** prohibits the production of 18 types of HFCs from **25 February 2025** and restricts their importation and exportation subject to approval from **1 July 2025**.

Further Restrictions on PFAS:

On 13 May 2025, the Ministry of Environment (MOENV) added 397 new chemical substances to the **Categories and Management of Handling for Toxic Chemical Substances**. The following PFAS substances are now officially classified as **Toxic Chemical Substances**, with new operational management regulations and specified control concentrations:

- 5 Perfluorooctane Sulfonic Acid (PFOS) salts and related compounds;
- 352 Perfluorooctanoic Acid (PFOA) salts and related compounds.

In a separate move in August 2025, the MOENV announced its intention to regulate an additional 269 PFAS as **Concerned Chemical Substances** through the proposed **List of Per- and Polyfluoroalkyl Substances and Management Measures**, which will become effective from 1 January 2026 if adopted. The management measures focus on supply chain traceability and information transmission rather than outright restrictions on all intended uses.

Prohibitions on Mercury and other POP-Containing Products:

In November, the MOENV proposed to add three other POPs - Methoxychlor (DDT), Dechlorane Plus and UV-328 - to the list of **Toxic Chemical Substances** under the **Categories and Management of Handling for Toxic Chemical Substances**, limiting their manufacture, import, sale or use to research and

educational purposes only. The same proposal also seeks to strengthen the prohibited use of mercury in certain products and provides for their phase-out deadlines.

Mercury-Containing Products	Phase-Out Deadline
Compact fluorescent lamps for general lighting purposes that are > 30 watts	31 December 2026
Compact fluorescent lamps with a non-integrated ballasts for general lighting purposes that are ≤ 30 watts (mercury content < 5 mg per lamp burner)	31 December 2026
Linear fluorescent lamps for general lighting purposes <ul style="list-style-type: none"> • Halophosphate phosphor ≤ 40 watts (mercury content < 10 mg per lamp) • Halophosphate phosphor > 40 watts 	31 December 2026
Non-linear fluorescent lamps for general lighting purposes <ul style="list-style-type: none"> • Halophosphate phosphor, all wattages 	31 December 2026
Linear fluorescent lamps for general lighting purposes <ul style="list-style-type: none"> • Triband phosphor < 60 watts (mercury content < 5 mg per lamp) • Triband phosphor ≥ 60 watts (mercury content < 5 mg per lamp) • Triband phosphor ≥ 60 watts (mercury content > 5 mg per lamp) 	31 December 2027
Non-linear fluorescent lamps for general lighting purposes <ul style="list-style-type: none"> • Triband phosphor, all wattages 	31 December 2027

5.3. Japan

Class I Specified Chemical Substances and their Restrictions in Products:

Throughout 2025, the Japanese government has imposed stricter control on chemicals in products. Many substances are designated as **Class I Specified Chemical Substances** under the **Chemical Substances Control Law (CSCL) Enforcement Regulation**, prohibiting their manufacture, import and use without approval. Specified products containing or using the substances are also subject to import bans. The substances are:

- Perfluoroalkanoic acids (PFOA), their salts and PFOA-related substances;
- Methoxychlor, dechlorane plus and UV-328;
- Perfluoro(hexane-1-sulfonic acid)-related substances (PFHxS-related substances)*;
- Chlorpyrifos, medium-chain chlorinated paraffins (MCCP), long-chain perfluorocarboxylic acids (PFCA) and their salts, and long-chain PFCA-related substances*.

* Note: Still at proposal stage.

Specified products containing dechlorane plus (e.g. EEE components) and UV-328 (e.g. UV absorber for plastics) are officially prohibited from import into Japan from June 2025.

Prohibitions on Specified Mercury-Using Products:

Earlier in December 2024, Japan expanded the scope of “specified mercury-using products” under the **Preventing Environmental Pollution of Mercury Act**. The following 10 products will be officially designated as “specified mercury-using products” and therefore subject to manufacturing ban from 2026, 2027 or 2028 respectively. A further notice issued by the Ministry of Economy, Trade, and Industry (METI) - **Notice No. 7** of 7 March 2025 - scheduled an import ban on these products corresponding to the dates of manufacturing ban:

Specified Mercury-Using Products	Manufacturing/Import Ban
Button zinc silver oxide batteries (mercury content < 1%) Button zinc air batteries (mercury content < 2%)	1 January 2026
Compact fluorescent lamps with an integrated ballast for general lighting purposes that are ≤ 30 watts (mercury content < 5 mg per lamp burner)	1 January 2026
Cold cathode fluorescent lamps and external electrode fluorescent lamps for electronic displays	1 January 2026
Electrical and electronic measuring devices	1 January 2026
Compact fluorescent lamps for general lighting purposes that are > 30 watts	1 January 2027
Compact fluorescent lamps with a non-integrated ballast for general lighting purposes that are ≤ 30 watts (mercury content < 5 mg per lamp burner)	1 January 2027
Linear fluorescent lamps for general lighting purposes: <ul style="list-style-type: none"> ● Halophosphate phosphor ≤ 40 watts (mercury content < 10 mg per lamp) ● Halophosphate phosphor > 40 watts 	1 January 2027
Non-linear fluorescent lamps for general lighting purposes <ul style="list-style-type: none"> ● Halophosphate phosphor, all wattages 	1 January 2027
Linear fluorescent lamps for general lighting purposes <ul style="list-style-type: none"> ● Triband phosphor < 60 watts (mercury content < 5 mg per lamp) ● Triband phosphor ≥ 60 watts (mercury content < 5mg per lamp) ● Triband phosphor ≥ 60 watts (mercury content > 5 mg per lamp) 	1 January 2028
Non-linear fluorescent lamps for general lighting purposes <ul style="list-style-type: none"> ● Triband phosphor, all wattages 	1 January 2028

5.4. Vietnam

The **Draft Decree**, published by the Vietnamese Ministry of Industry and Trade (MOIT) on September 5, 2025, provides crucial detailed guidance for **implementing numerous articles of Vietnam's Law on Chemicals**. This regulation establishes comprehensive conditions for chemical activities, formalizes the management of chemical information (including new chemical registration), and introduces a new mandatory framework for controlling and disclosing information about dangerous chemicals contained within products and goods.

For the purpose of this whitepaper, Chapter IV highlights the framework for managing dangerous chemicals embedded in final products. To enforce this, relevant ministries will issue a separate list of these chemicals requiring mandatory information disclosure. Consequently, organizations producing or importing products that contain dangerous chemicals must establish a stringent control process to monitor the chemical composition and concentration in raw materials, during production, and in the final product.

For each production or import batch, organizations must:

1. **Declare specific information** (product name, dangerous chemical name/concentration, hazardous properties, and field of use) on the specialized chemical database, verified by a qualified testing laboratory.
2. **Publicly disclose** the chemical composition/concentration and provide recommendations for restricted use, either on the product label or via an electronic information page.
3. **Maintain records** to prove the accuracy of all declared information.

5.5. Hong Kong

On May 30, 2025, the **Hong Kong** Environment and Ecology Bureau issued an **amendment to the Mercury Control Ordinance (Cap 640)**, signalling a significant step toward controlling mercury pollution in the region. The primary objective of the amendment is to stage the revision of Schedule 3 of the Ordinance to include 16 types of mercury-added products and to impose restrictions on their production, import, and export. The initial phase of restrictions will take effect on **December 31, 2025**, targeting the first eight product categories. These initial restrictions will apply to products such as:

- Compact fluorescent lamps (CFLs) for general lighting;
- Cold cathode and external electrode fluorescent lamps (CCFLs/EEFLs) for electronic displays;
- Strain gauge to be used in a plethysmograph;
- Electrical and electronic measuring devices;
- Mercury vacuum pump;
- Tyre balancer and wheel weight;
- Photographic film and paper;
- Propellant for satellites and spacecraft.

The amendment specifies that the effective dates for the remaining eight mercury-added product categories will be announced separately. This second phase of regulatory implementation is conditional upon the relevant international convention - likely referring to the Minamata Convention on Mercury - becoming applicable to the Hong Kong Special Administrative Region. Products in this subsequent phase include general consumer items as follows:

- Batteries;
- Switches and relays;
- Cosmetics;
- Linear fluorescent lamp for general lighting:
 - Specific types of linear fluorescent lamps for general lighting will be phased out in two phases, based on their wattage;
- Linear fluorescent lamp, and non-linear (including U-bend and circular) fluorescent lamp, for general lighting;
- Non-linear, including U-bend and circular, fluorescent lamp for general lighting that is made of halophosphate phosphor.

5.6. Singapore

The Singapore Ministry of Sustainability and the Environment (MSE) and the National Environment Agency (NEA) have implemented two key legislative actions in 2025 to tighten controls on hazardous substances and mercury-added products, aligning with international standards.

I. Exemptions for Persistent Organic Pollutants (POPs)

On March 21, 2025, the MSE issued an order amending the **Second Schedule of the Environmental Protection and Management Act**, which focuses on the control of hazardous substances. This amendment, effective March 24, 2025, introduces specific, temporary exemptions for the use of two persistent organic pollutants (POPs): **Dechlorane Plus** and **UV-328**. These exemptions are crucial for specialized, high-reliability applications where no suitable alternatives currently exist. For both substances, exemptions are granted for all medical devices and for adhesives, fillers, and plastics.

- **Dechlorane Plus:** Exemptions heavily target: aerospace, space, and defence applications, as well as replacement parts for motor vehicles, stationary industrial machines, and various analytical instruments.
- **UV-328:** Exemptions focus on: specific motor vehicle parts (e.g., bumpers and grills), industrial coating applications for vehicles and large steel structures, mechanical separators in blood collection tubes, and specific components in photography and liquid crystal displays.

II. Control on New Chemicals and Mercury-Added Products

On June 13, 2025 (with a minor revision on June 20, 2025), the NEA issued a Circular specifying the control of **two groups of industrial chemicals** and **nine categories of mercury-added products** under the **Environmental Protection and Management Act 1999** and its associated Regulations.

- **New Controlled Chemicals:**
 - **Long-chain Perfluorocarboxylic Acids (LC-PFCAs)** (chain lengths C9-C21), their salts and related compounds.
 - **Medium-chain Chlorinated Paraffins (MCCPs)** (chain lengths C14-C17).
- **Hazardous Substances Control:** From August 1, 2025, the handling of these listed chemicals will require an HS Licence (for import, export, manufacture, and sale), an HS Permit (for storage and usage), and an HS Transport Approval (HSTA).
- **Mercury-Added Product Ban:** Also effective August 1, 2025, the nine listed mercury-added products can no longer be imported, exported, or manufactured in Singapore. These banned items align with international efforts to phase out mercury, covering specific types of Compact



Fluorescent Lamps (CFLs), fluorescent lamps for electronic displays, specialized electrical and electronic measuring devices, mercury vacuum pumps, tyre balancers, photographic film/paper, and propellants for satellites/spacecraft. Existing stocks of these mercury-added products imported before the ban date may be used and sold locally until they are depleted.



06. Product Quality, Safety & Standardization

6.1. China

The regulatory environment in **China** is also undergoing a significant transformation in 2025, with a focus on product safety.

For instance, several new Mandatory National Standards (GB Standards) have been proposed, enforcing strict compliance across various product types. A major focus is on energy storage, with new drafts on lithium-ion batteries covering technical safety specifications for stationary power sources and mandatory coding regulations for traceability.

On 17 November 2025, the Chinese Ministry of Industry and Information Technology (MIIT) proposed a new draft national compulsory standard on the **safety technical specifications of lithium-ion cells and batteries used in stationary power sources and similar systems (GB 40156-20XX)**.

The draft standard proposes updating the safety requirements for lithium-ion cells and battery packs used in stationary power supply and similar large-capacity systems. It also raises the safety bar by introducing more rigorous testing protocols.

The MIIT also introduced the **draft standard on the coding regulations of lithium-ion batteries** in November 2025. The draft standard is designed to significantly enhance the monitoring, traceability and regulatory compliance for lithium-ion batteries both domestically and internationally. This draft will cover coding requirements for all levels of battery assembly - the single cell, module, pack, cluster, and system - detailing the coding structure, presentation method, and coding identifiers to ensure standardized global reporting and identification. However, automotive power/traction lithium-ion batteries are excluded from this draft.

6.2. Taiwan

Mandatory Commodity Inspection of PV Inverters:

Just like China who just proposed a draft mandatory national standard (GB) for the safety of photovoltaic modules, in November 2025, Taiwan's Bureau of Standards, Metrology and Inspection (BSMI) adopted the **Legal Inspection Requirements for PV Inverters**. Essentially, the BSMI is including **photovoltaic inverters not exceeding 100kW** in the mandatory inspection scope to ensure consumer safety. In-scope products, whether imported or domestically produced, are subject to inspection commencing **1 July 2027**. Two alternative conformity assessment procedures are made available for the choice of applicants, namely Registration of Product Certification (RPC) or Type-Approved Batch Inspection (TABI).

The products must comply with the following inspection standards:

Inspection Areas	Inspection Standards
Safety	CNS 15426-1 (2011) and CNS 15426-2 (2013)
Electromagnetic Compatibility (EMC)	Choose one of the following: <ul style="list-style-type: none">• For use only in industrial environments: CNS 14674-2 (2023) and CNS 14674-4 (2023)• For use not exclusive to industrial environments: CNS 14674-1 (2023) and CNS 14674-3 (2022)• CNS 62920 (2023)
For use with the function of transmitting electricity to the grid of Taiwan Power Company	CNS 15382 (2018)
Security Testing	Technical Specification for Security Testing of PV Inverters and Monitoring Units
RoHS Labeling	CNS 15663 (2023) Section 5 Labeling Products must indicate the presence of restricted substances on the product itself, packaging, label, or in the instructions. However, if information on restricted substances is provided via a website, the website address must be clearly displayed on the product itself, packaging, label, or instructions.

6.3. India

Quality Control on Consumer Products:

The Indian Ministry of Commerce and Industry continues to issue and enforce **Quality Control Orders (QCOs)**, making standards of the Bureau of Indian Standards (BIS) mandatory for a growing list of consumer products, such as:

- Electrical Appliances for Domestic Water Heating (effective 21 January 2025);
- Air Cooler and Air Filters (effective 30 January 2025);
- Aluminium and Aluminium Alloy Products (effective 1 October 2025);
- Electrical Appliances for Commercial Dispensing and Vending (effective 1 October 2025);
- Household, Commercial and Similar Electrical Appliances (effective 19 March 2026).

6.4. South Korea

Mandatory Provision of USB Type-C Receptacle Connector:

As the **EU's Common Charger Directive** becomes more established, territories in the Asia region are beginning to consider or implement similar requirements. The push for a common USB-C charger is driven by a desire to reduce e-waste and promote sustainability. Many governments are looking to lower the environmental impact of electronic device production and disposal. From a consumer's perspective, a universal charging standard reduces the need for consumers to purchase separate chargers for new devices, improving convenience and saving money.

On 5 November 2025, the South Korean Ministry of Science and ICT published Notice No. 2025-56, requiring specified devices to support USB-C charging. From **5 November 2026**, the following devices that are charged via wired charging or that simultaneously transmit data via wired charging must be equipped with a USB Type-C receptacle connector:

- Mobile phones;
- Tablets;
- Digital cameras;
- Headphones;
- Headsets;
- Portable video game console;
- Portable speakers;
- E-book readers;
- Keyboards;
- Mouse;
- Portable navigation device;
- Earphones;
- Laptop.

6.5. Indonesia

Compulsory Enforcement of National Standards for Products:

In 2025, the mandatory implementation of **Indonesian National Standards (SNIs)** becomes effective for several products. The following products, whether produced domestically or imported, must comply with specified SNIs before being put on the Indonesian market:

Product Types	SNIs for Product Quality Conformity Testing	Commencement Dates
Cables	<ul style="list-style-type: none"> ● SNI 04-6629.3-2006 ● SNI 04-6629.4-2006 ● SNI 04-6629.5-2006 ● SNI IEC 60502-1:2009 ● SNI IEC 60502-2:2009 	18 April 2025
Primary Batteries	<ul style="list-style-type: none"> ● SNI IEC 60086-1:2015 ● SNI IEC 60086-2:2015 	20 May 2025
Audio, Video and Similar Electronic Apparatus <ul style="list-style-type: none"> ● Televisions; ● DVD disc players and blu-ray disc players; ● Car tapes; ● Active speakers; ● Set top boxes for television sets. 	<ul style="list-style-type: none"> ● SNI IEC 62368-1:2014 	2 June 2025
Household Electronics <ul style="list-style-type: none"> ● Air conditioners; ● Washing machines; ● Refrigerators, freezers; ● Water pumps, submersible water pumps; ● Electric and steam irons (with water reservoir, boiler); ● Electric blenders, electric juicers, electric mixers, choppers, food processors; ● Rice cookers, slow cookers; ● Electric kettles; ● Submersible water heaters; ● Water dispensers. 	<ul style="list-style-type: none"> ● SNI IEC 60335-1:2020 ● SNI IEC 60335-2-40:2009 ● SNI IEC 60335-2-7:2010 ● SNI IEC 60335-2-24:2020 ● SNI IEC 60335-2-41:2010 ● SNI IEC 60335-2-3:2022 ● SNI IEC 60335-2-74:2010 ● SNI IEC 60335-2-14:2011 ● SNI IEC 60335-2-15:2011 ● SNI IEC 60335-2-89:2015 	24 July 2025

Besides product quality conformity testing in accordance with the relevant SNIs, the conformity assessment also covers the audit of production processes and implementation of quality management systems in accordance with ISO 9001:2015.

Products that have met the SNI requirements and obtained the SNI certificate must be affixed with the SNI mark once approval has been obtained from the relevant authority in the form of SPPT SNI (Approval Letter for the Use of SNI Mark).

6.6. Vietnam

Vietnam is shifting its product safety regulation to a modern, risk-based classification (low, medium, high) aligning with ISO/IEC 31010, as outlined in a **Draft Decree implementing the amended Law on Product and Goods Quality**. This affects all organizations producing and trading products in Vietnam.

The key regulatory pillars of this update are:

- **Risk-Based Management:** Products will be classified by risk level, with the Ministry of Science and Technology (MOST) and coordinating ministries responsible for creating and updating the mandatory list of medium and high-risk products. This classification dictates the level of regulatory oversight.
- **Mandatory Traceability and Digitalization:** The draft decree promotes the application of technology across the supply chain. Traceability will be mandatory for high-risk products, utilizing barcodes (1D, 2D, RFID) and adhering to national standards.
- **Digital Product Passports (DPPs) and E-Labels:** The proposal introduces the concept of the Digital Product Passport - an electronic record with a unique identifier that must contain truthful, complete, and up-to-date quality information and connect to the national traceability portal. The implementation of DPPs will be phased, prioritizing key Vietnamese products, especially high-risk electronic goods. Electronic labels (E-Labels) are permitted, but for medium and high-risk products, name, responsible party, and origin must remain on a physical label. E-Labels must be registered on the national electronic label database.
- **Comprehensive Labeling Obligations:** Chapter IV mandates detailed labeling requirements. All goods circulating in Vietnam require a Vietnamese label displaying the product name (most prominent text), the name/or address of the responsible organization (manufacturer and/or importer), and the country/territory of origin. Foreign language content is permitted but must correspond to the Vietnamese text and not be larger. Imported goods lacking mandatory Vietnamese information require a supplementary physical or electronic label.
- **E-commerce Regulation:** Product labeling and E-label rules now explicitly extend to goods sold on e-commerce platforms. Sellers must publicly display all required label information before purchase, and platform owners must cooperate by storing and providing data for enforcement purposes.
- **Inspection Exemption:** A system is detailed to allow for exempting or reducing quality inspections for medium and high-risk products during both production and import, provided specific compliance criteria are met.
- **Transitional Provisions:** To ensure continuity, goods manufactured, labeled, or packaged before the decree's effective date, compliant with the old Decree No. 43/2017/ND-CP, may continue to be circulated and used until their expiry date.

6.7. Thailand

Thailand is expanding to cover a wider range of products and technical compliance measures. This is evident from the approval of Announcement establishing **TIS 61730 Part 2-2567** which was published by the Thai Ministry of Industry in February 2025. TIS 61730 Part 2 focuses on the requirements for testing necessary for the safety qualification of Photovoltaic (PV) modules. These tests cover general inspection, electric shock hazards, fire hazards, and resistance to mechanical and environmental stress. Subsequently, the Thai Ministry introduced a draft ministerial regulation that proposes to make the standard mandatory. If approved, all crystalline silicon solar panels imports and local produced units are required to comply with this standard.

6.8. Singapore

The Singapore Consumer Product Safety Office (CPSO) issued a circular on July 9, 2025, detailing **updated regulatory requirements for toughened glass gas hobs under the Consumer Protection (Safety Requirements) Regulations (CPSR)**. This amendment primarily modifies the way registered suppliers must provide consumers with safety advisories. Effective July 9, 2026, suppliers must exclusively redirect consumers to the official CPSO website via a QR code advisory. This code must be either affixed directly to the gas hob surface or printed within the instruction manual.

This transition mandates the discontinuation of the current practice of supplying a physical, printed toughened glass brochure. The new QR code advisories are subject to specific technical specifications detailed in the circular's Annex A. Any toughened glass hob supplied in Singapore that does not comply with these mandatory QR code specifications after the deadline will be deemed non-compliant with the CPSR and will not receive approval for sale. This shift underscores the CPSO's move towards modernizing consumer safety communication and ensuring crucial safety information is digitally accessible.



07. Digital Product Security & Artificial Intelligence

7.1. China

Recently, the Chinese Cyberspace Administration (CAC) has proposed a draft notice on **Cybersecurity Labeling Management Measures** on November 21, 2025, aimed at enhancing product cybersecurity, protecting consumer rights, and safeguarding national security. The measures establish a voluntary labeling system for products with internet connection features, with consumers encouraged to prioritize labeled products. The framework is designed to be phased in, starting with a specific product catalogue and introducing three capability levels, which are: 1. Basic Level; 2. Enhanced Level; and 3. Leading Level. The draft also specifies that the cybersecurity label must explicitly include the cybersecurity capability level, the producer name, product specifications, the validity period, and a record-filing information code for accessing the test report.

Recognizing the transformative power and inherent risks of AI, China is systematically moving to establish a robust governance framework. On January 26, 2025, the Chinese National Technical Committee 260 on Cybersecurity Standardization Administration proposed the **Artificial Intelligence (AI) Safety Standard System (Version 1)**. This draft framework directly impacts manufacturers and developers by establishing a comprehensive system aimed at managing safety risks across the entire lifecycle of AI products and services. Additionally, these standards are also explicitly designed to guide the implementation of AI in various industries and fields, providing specific requirements for both personal applications and broad industry applications. The Key Technology Standards component also addresses the development of AI-related technologies, with a focus on regulating the safety of various AI services.

7.2. Taiwan

Cybersecurity of Network and IoT Products:

On 28 October 2025, the Taiwanese BSMI announced their plan to revise the **Legal Inspection Requirements for Information Technology Products** and the **Legal Inspection Requirements for Audio and Video Equipment** by introducing **cybersecurity testing requirements** for **network products**, as well as **IT and audiovisual products with network connectivity (wireless or wired)**, save for those classified as medical devices or telecommunications terminal equipment. From **1 January 2028**, both domestically produced and imported products must be inspected against the applicable cybersecurity standards.

Product Types	Inspection Standards for Cybersecurity
Network Products: <ul style="list-style-type: none"> ● Routers ● Bridges ● Switches ● Network hubs ● Gateways (including smart speakers and smart home assistants) 	Wireless connectivity or both wireless and wired connectivity - (1) or (2) Wired connectivity only - (1) (1) CNS 16190 (2023) (2) CNS 18031-1 (2025) , CNS 18031-2 (2025)
Network-Connected Digital Cameras	Wireless connectivity or both wireless and wired connectivity - (1), (2) or (3) Wired connectivity only - (1) or (2) (1) CNS 16120-1 (2022) , CNS 16120-2 (2019) , CNS 16132-1 (2022) , CNS 16132-2 (2023) (2) CNS 16190 (2023) (3) CNS 18031-1(2025), CNS 18031-2 (2025)
Network-Connected Video Recorders	Wireless connectivity or both wireless and wired connectivity - (1), (2) or (3) Wired connectivity only - (1) or (2) (1) CNS 16120-1 (2022), CNS 16120-3 (2021) , CNS 16132-1 (2022), CNS 16132-3 (2023) (2) CNS 16190 (2023) (3) CNS 18031-1 (2025), CNS 18031-2 (2025)
Network-Connected Monitors	Wireless connectivity or both wireless and wired connectivity - (1) or (2) Wired connectivity only - (1) (1) CNS 16190 (2023) (2) CNS 18031-1 (2025), CNS 18031-2 (2025)

Product Types	Inspection Standards for Cybersecurity
Network-Connected Televisions	Wireless connectivity or both wireless and wired connectivity - (1) or (2) Wired connectivity only - (1) (1) CNS 16190 (2023) (2) CNS 18031-1 (2025), CNS 18031-2 (2025)

7.3. Japan

Artificial Intelligence Framework Act:

On 4 June 2025, Japan's **Promotion of Research, Development, and Utilization of Artificial Intelligence-Related Technology Act** entered into force. It officially mandates individuals who intend to develop or provide products or services that utilize AI-related technologies, as well as other businesses utilizing AI-related technologies in their business activities, to cooperate with the measures set forth by the national and local governments.

7.4. South Korea

Artificial Intelligence Framework Act and Proposed Enforcement Decree:

The **Framework Act on the Advancement of Artificial Intelligence and the Establishment of Trust-Based Systems** (enacted on 21 January 2025, entering into force on 22 January 2026) require individuals or entities offering products or services utilizing high-risk or generative AI to notify users in advance that the product or service is based on such AI.

Developers and providers of high-risk AI are mandated to implement specified measures to ensure reliability and safety. For example, they must:

- Establish and maintain risk management plans throughout the AI lifecycle;
- Retain documentation verifying the implementation of reliability and safety measures for review by the Minister of Science and ICT;
- Develop explanatory plans detailing the AI's final results, key criteria, and the data used in its development and use;
- Establish user protection plans;
- Ensure personnel management and oversight to guarantee accountability and compliance;
- Provide clear notifications to users when AI-generated outputs resemble real-life elements, such as audio, images, or videos;
- Address additional matters specified by the Committee to ensure the safety and reliability of high-risk AI.

Providers are particularly required to assess the potential human rights impacts of high-risk AI before offering products or services.

On 12 November 2025, the **draft Enforcement Decree for the Framework Act** was released, establishing detailed procedures and definitions necessary to implement the principal Act. It imposes several duties on AI business operators, and prescribes administrative fines for non-compliance. For instance:

- Operators of high-risk AI must implement and document measures for risk management, explanation methods, and user protection, keeping records for five years. They must also post major details of these measures online.
- Operators of high-risk AI and generative AI must provide prior notice of their use through methods like contracts, terms, or on-screen display, making sure the notice is clearly visible considering the user's characteristics.

7.5. Vietnam

Vietnam's new **Cybersecurity Law** consolidates existing laws to broaden coverage for information safety, national security, and public safety in cyberspace. Particularly, Chapter V explicitly provides that cybersecurity standards and technical regulations shall apply to information systems, hardware, software, security management and operation systems, cybersecurity products and services, information technology, and network-connected equipment. The certification and/or declaration of conformity must be carried out pursuant to the relevant law on standards and technical regulations. The Ministry of Public Security (MPS) is responsible for the following matters:

- Developing national standards and technical regulations on cybersecurity;
- Managing the quality of cybersecurity products and services, except for civilian cryptography products and services;
- Registering, designating, and managing the operations of organizations certifying conformity with cybersecurity requirements.

Cybersecurity services and products that are regulated by this law include:

- **Cybersecurity Products:** Civilian cryptography products; cybersecurity inspection and assessment products; cybersecurity monitoring products; anti-attack and anti-intrusion products; and others.
- **Cybersecurity Services:** Cybersecurity inspection and assessment services; information security services that do not use civilian cryptography; civilian cryptography services; cybersecurity consulting services; cybersecurity monitoring services; cybersecurity incident response services; data recovery services; cyber-attack prevention and countermeasure services; and others.

Businesses dealing in cybersecurity products and services must adhere to several responsibilities, including but not limited to the following:

- Possess a license for the business of cybersecurity products and services.
- Ensure the quality of products and services meets the standards and technical regulations in accordance with the law on product quality and goods, and the law on standards and technical regulations before circulating them on the market.



08. Conclusion

The year 2025 marked a major regulatory shift in Asia towards mandatory, comprehensive compliance frameworks, driven by global alignment and net-zero commitments.

This transition was defined by our themes: product sustainability and circularity, product chemical restrictions, product safety and standardization, and digital product security and AI governance. This acceleration was largely propelled by regional commitment to integrate compliance into core product design and lifecycle management and alignment with global legislation.

As 2025 concludes, the primary trend for 2026 is the operationalization and deepening of existing frameworks. Key regulations, finalized in 2025, are set to take effect, including:

- **Vietnam's Draft EPR Decree** (anticipated effect): Imposing immediate recycling and financial obligations.
- **Japan's strengthened Resource Circulation system** (effective April 1, 2026): Mandates the use of recycled resources in designated products.
- **Major chemical phase-outs** (effective January 1, 2026): China bans HFC-using household refrigeration and initiates the first phase of the HCFC-141b ban in polyurethane foam.
- **Japan's mercury ban** (effective January 1, 2026): Commences import/manufacturing ban for certain mercury-using products (batteries, CFLs).
- **South Korea's AI Act** (effective January 22, 2026): Compels developers of high-risk/generative AI to implement risk management, reliability, and user notification measures.

Businesses must prepare for a significant transition in 2026, where regional compliance moves from monitoring to mandatory, actionable implementation, impacting product design, data management, and operational processes. Companies must move quickly to achieve full, traceable compliance with new national standards and the final versions of major regional decrees, such as the anticipated Vietnam EPR implementation and Japan's mandatory recycled content system.

This requires a substantial investment in data readiness, as businesses will need to collect, manage, and report complex metrics on material composition, recycled content, and greenhouse gas emissions to satisfy new disclosure rules. Finally, companies face the necessity of a product

and supply chain overhaul to meet the design-level mandates of the circular economy and to conform to strict chemical bans that will physically affect product manufacturing, packaging, and material sourcing.

Therefore, companies are encouraged to utilize regulatory tracking and horizon scanning tools like [C2P](#) to monitor regulatory developments and ensure continuous compliance.

Want to see how we can help you stay ahead of complex regulatory requirements in Product Compliance and ESG in 2026? [Start a conversation now!](#)

OUR NUMBERS

300+

CUSTOMERS WORLDWIDE

195

COUNTRIES COVERED

100,000+

REGULATIONS