

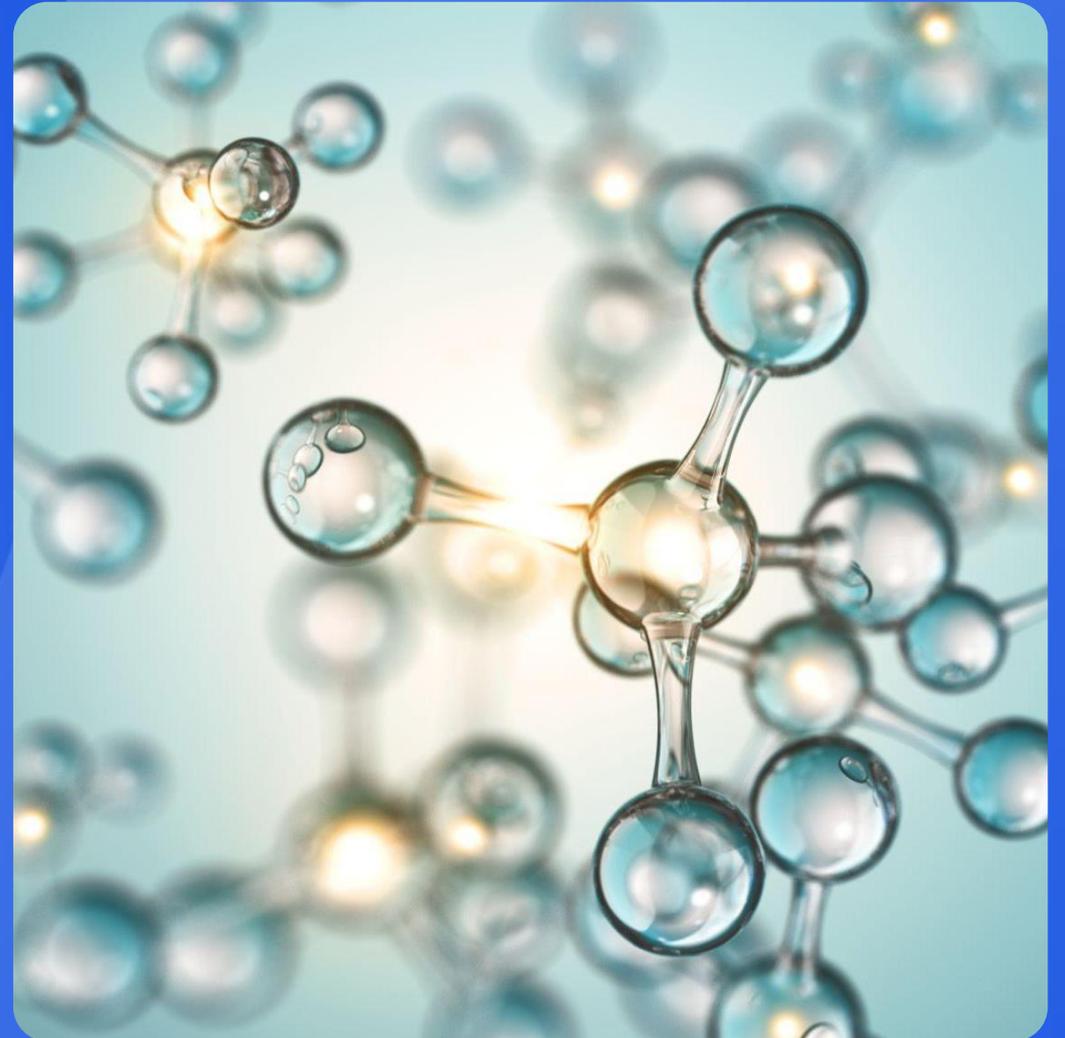


Compliance & Risks

Webinar

Chemicals Quarterly ***Q4 2025 Regulatory Update***

28th January, 2026



→ | complianceandrisks.com



**Q&A
Session**

**Slides &
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Meet the Team



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Mission Statement

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

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Regulations

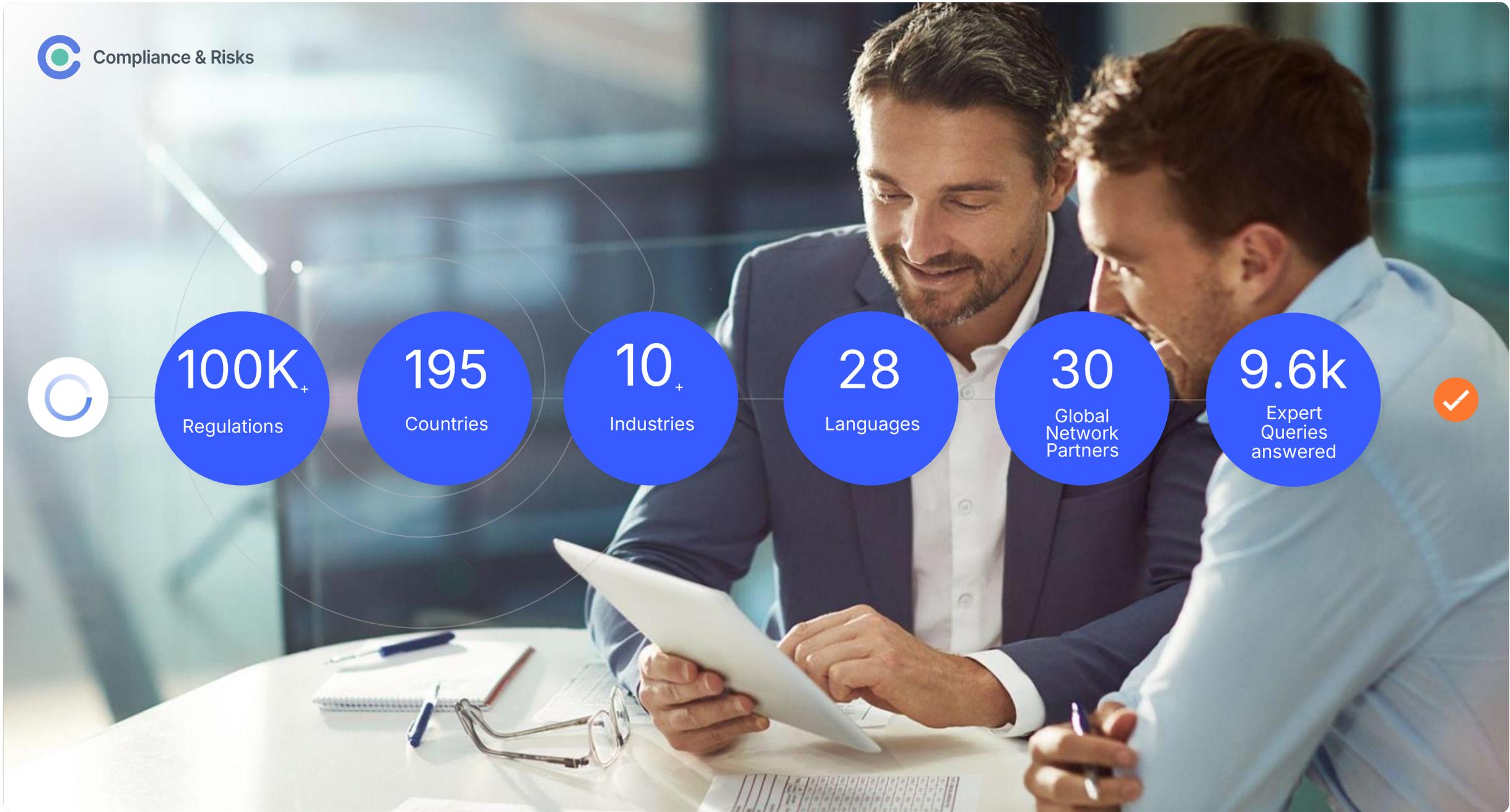
195
Countries

10⁺
Industries

28
Languages

30
Global Network Partners

9.6k
Expert Queries answered



WHAT WE DO

Unlocking Market Access

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



Agenda

- 01. North America**
- 02. Australia/New Zealand**
- 03. Europe**
- 04. Asia**





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North America



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New Prohibitions



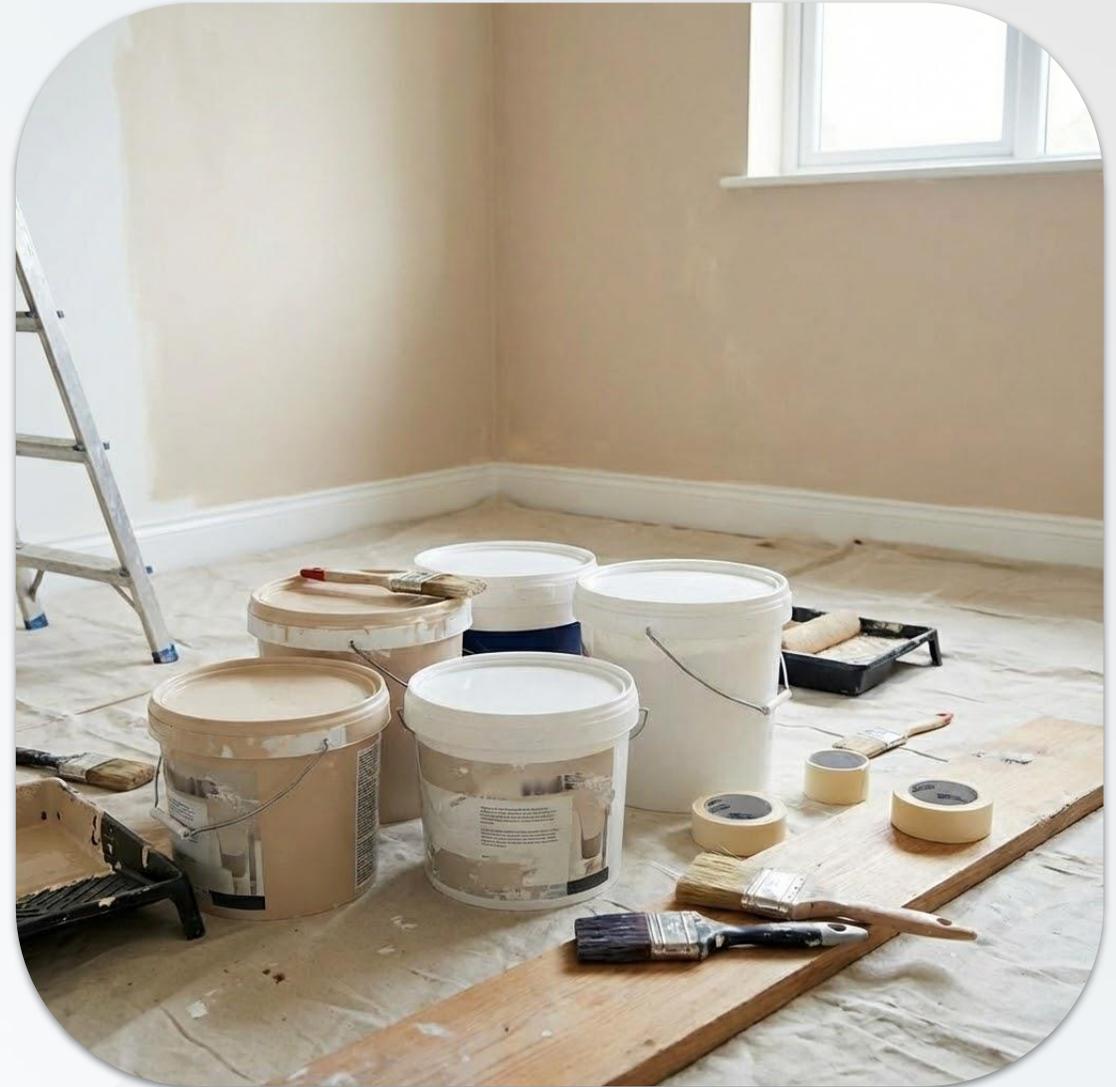
- Total ban on marketing and sale of cosmetic products containing Trimethylbenzoyl Diphenylphosine Oxide and Dimethyltolylamine
- Automatic cancellation of existing sanitary registrations and pending applications for all non-compliant formulations
- Formal submission of recall logistics and volume data to the National Directorate of Pharmacy and Drugs required by **3 December 2025**
- Ban in effect as of **22 October 2025**



Lead in Mexico



- Mandatory maximum permissible limit of 90 ppm for total lead content, calculated on the weight of the total non-volatile content of the paint
- Applies to paints and related products
- Requires clear risk communication on containers applicable to products exceeding the limit (where specific exemptions apply) or containing lead to include standardized warning statements
- Comments were due by **30 December 2025**



TSCA Section 8(a)(7)

Proposed PFAS Reporting Revisions

- Proposed 40 CFR Part 705 amendments to focus on primary manufacturing while excluding activities where PFAS data is not "reasonably ascertainable"
- Introduction of a 0.1% de minimis threshold, alongside full exemptions for imported articles, impurities, non-isolated intermediates, and R&D substances
- Shift from a six-month to a three-month submission period, beginning 60 days after the final rule is published
- Significant reduction in reporting burden for article importers and small businesses
- Unchanged: The structural PFAS definition and the original 01 January 2011 to 31 December 2022 lookback period remain the same.

16 CFR 1250



- Effective **12 March 2026**, water beads (pre-hydrated state) must fit in a small parts cylinder and, after a 72-hour soak, pass through a 5.0 mm funnel or sieve gauge under their own weight
- Mandatory extractable acrylamide limits are set at 325 μg per 100 small beads (≤ 4 mm) or per 1 large bead (≥ 4 mm) to mitigate neurotoxicity risks
- Packaging must feature high-visibility, bolded warnings explicitly stating: "**Children have DIED when the beads blocked their intestines**" and "**Inserted beads have resulted in surgeries.**"



CA Cosmetic Bills Enacted

AB 60

- Total ban applies to musk ambrette, musk tibetene, musk moskene, and musk xylene in all cosmetic products
- Musk Ketone concentrations are capped at 1.4% for fine fragrances and 0.56% for eau de toilette, with a 0% allowance for oral care products
- Effective **1 January 2027**

SB 236

- Formal ban on specified toxic ingredients in hair relaxers, including formaldehyde, certain phthalates (DBP/DEHP), and parabens
- Department of Toxic Substances Control must publish approved testing methods by **1 January 2028** and adopt final enforcement regulations by **1 January 2030**
- Manufacturers must register relaxer products by **1 July 2030** and provide compliance documentation or laboratory test results upon DTSC request

Prop 65: Proposed NSRL Amendments

1-Bromopropane (1-BP)

- Proposed NSRL of **54 µg/day**
- Targets industrial solvent uses (degreasing, adhesives) and chemical intermediates

Diethanolamine (DEA)

- Proposed Dermal-only NSRL of **6.4 µg/day**
- Addresses common surfactants and impurities in personal care products

Comment deadline: 7 November 2025

Industry groups argue the 6.4 µg/day limit is overly conservative.

Vinyl Acetate



- Effective **3 January 2026**
- Specifically impacts products containing Vinyl Acetate-derived materials, including Polyvinyl Acetate (PVA) and Ethylene-Vinyl Acetate (EVA)
- Testing should measure the amount of the chemical released during normal use, purchase, storage, or repair
- Parties issuing a 60-day Notice must provide factual information establishing the basis of the Notice



Prop 65: List Additions

Bisphenol S (BPS)

- Developmental toxicity endpoint added on **5 December 2025**
- Warning requirements for previous reproductive listings became mandatory on **29 December 2024**

Diethanolamine (DEA)

- Formally listed as a carcinogen effective **8 December 2025** following an 8–1 vote by the Carcinogen Identification Committee (CIC)
- Statutory one-year grace periods apply; mandatory warning compliance for N-Methyl-N-Formylhydrazine begins **8 December 2026**

Required Labels



- Effective from **1 July 2026** until the comprehensive product ban on **1 January 2028**
- DEEP-sanctioned phrases include "**Contains PFAS,**" "**Made with PFAS,**" or "**Made with intentionally added PFAS**"
- Labels must be clearly visible to the purchaser at the point of sale
- Applies to 12 specific categories: apparel, carpets/rugs, cleaning products, cookware, cosmetics, dental floss, fabric treatments, juvenile products, menstruation products, textile furnishings, ski wax, and upholstered furniture



Massachusetts Bill S 2660

Impact Assessment of PFAS Prohibitions and Chemical Reporting Requirements

- Explicit ban on intentionally added PFAS in children's products or components
- Establishment of "Chemicals of Concern" (COC) and "High Priority Chemicals" (HPC) lists to be published within 18 months
- Manufacturers must provide electronic notification within 180 days of a chemical being listed as a COC if present above de minimis levels.
- Phase-Out Mandates:
 - Substitution: Required within 3 years for mouthable products, cosmetics, or products for children under age 3.
 - Sales Ban: Comprehensive distribution ban for products containing HPCs within 5 years of listing.
- Civil penalties up to \$5,000 for first offenses; mandatory product recalls and retailer reimbursement for non-compliant goods

Minnesota PFAS Reporting

Deadline Extension

- The initial registration for all products containing intentionally added PFAS is now due **1 July 2026**, providing a six-month extension from the original statutory date
- The final rule permits manufacturers to group similar products and components, report PFAS concentrations in ranges, and submit joint reports to reduce administrative burden
- A flat, one-time fee of \$800 per manufacturer is required; subsequent annual reports for new products or significant changes are due by 01 February each year

Portal Launch

- The MPCA began a "soft launch" of the PFAS Reporting Information System for Manufacturers (PRISM) in December 2025, with full system access for all manufacturers scheduled for **January 2026**

New Jersey Tackles PFAS

S 4978

- Effectively bans the manufacture, sale, and distribution of apparel with intentionally added PFAS starting **two years following enactment**
- Apparel = everyday wear, formal wear, school uniforms, and outdoor gear, but specifically exempts PPE, military clothing, and motorcycle/off-highway vehicle protective gear

S 1042

- Expands bans to cosmetics, carpets, fabric treatments, and food packaging, with a compliance deadline **two years following enactment**
- Violations trigger the Consumer Fraud Act, carrying penalties up to \$10,000 for first offenses and \$20,000 thereafter
- Requires bilingual (English/Spanish) disclosure labels for any cookware containing intentionally added PFAS
- **Enacted on 12 January 2026**

Implementation of NMAC 20.13.2

Key Deadlines Ahead

- The proposed rule enters into effect on **1 July 2026**, following the Final Rule adoption expected by **30 June 2026**
- Phased Sales Bans: Prohibitions for high-priority categories (e.g., cookware, food packaging, juvenile products) commence **1 January 2027**, extending to textiles and cosmetics on **1 January 2028**
- Mandatory Reporting & Fees: Initial manufacturer reports and a \$2,500 fee are due by **1 January 2027**; a total market prohibition for non-exempt products without CUU status takes effect **1 January 2032**
- Requirements for English *and* Spanish labels begin **1 January 2027**, featuring a 10-point minimum font and a mandatory NMED URL or QR code
- Evidentiary hearings are scheduled for **23 February 2026 to 6 March 2026**, with a formal public comment deadline on **31 March 2026**

A 1797 Enacted



- Applies to topical products designed to weaken hair structure for straightening
- Effective **21 May 2027**
- Labeling for substances classified as carcinogens or reproductive toxicants by IARC, NTP, or US EPA
- Labeling Standards
 - Minimum 12-point font
 - "Clear and Conspicuous" warning on primary packaging



Washington Chapter 173-337 Update

PFAS Product Bans

Beginning **1 January 2026**, ban on the manufacture, sale, and distribution of PFAS-containing:

- Apparel
- Automotive washes
- Cleaning products

Reporting

Beginning **31 January 2027**, manufacturers of nine additional categories must report intentional PFAS use annually for:

- Apparel intended for extreme and extended use
- Footwear
- Gear for recreation and travel
- Automotive waxes
- Cookware and kitchen supplies
- Firefighting Personal Protective Equipment (PPE) (specifically "turnout gear")
- Floor waxes and polishes
- Hard surface sealers (for both interior and exterior applications)
- Ski waxes

New Authorizations in Canada

Ministerial Condition No. 22325

- 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-1-(2,2,2-trifluoroethyl)-5-(2,3,6-trifluorophenyl)-3-piperidinyl]-2'-oxo-, (3'S)-
- **Effective 2 October 2025**

Ministerial Condition No. 22245

- 1,3-propanediamine, N-[3-(C11-14-isoalkyloxy)propyl] derivs., C13-rich, acetates
- **Effective 23 October 2025**

Canada Simplifies Substances Schedule

Prohibition of Certain Toxic Substances Regulations, 2025

- Consolidates all substance-specific requirements into a single schedule to reduce administrative hurdles
- New prohibitions on Dechlorane Plus and decabromodiphenyl ethane, including products containing them
- Removes prior exemptions for PFOS, PFOA, LC-PFCAs, HBCD, and PBDEs, limiting activities previously permitted under the 2012 regime
- Establishes a 30-day window for permit applications following **31 December 2025** to allow temporary manufacture or import where no feasible alternatives exist

Canada Updates Non-DSL & DSL

Domestic Substances List

- Order 2025-66-10-01
- Order 2025-87-10-01
- Order 2025-112-10-01

Non-Domestic Substances List

- Order 2025-87-10-02
- Order 2025-66-11-02



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Australia/New Zealand



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Australia - Request for PFAS Presence

AICIS evaluation of 522 PFAS:

- What has been introduced?
- At what volume?
- What they are for?
- Which require further evaluation?

Notices requesting:

- Listed PFAS
- Name & CAS number
- Mode
- Total volume
- Specific end-use





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Europe



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Minamata Convention

EU Position COP6



Key actions and amendments:

- Annex A (products):
 - new phase-out dates for lamps and measuring devices
- Annex B (manufacturing):
 - restricting industrial uses of mercury & compounds



EU Tightens Chemical Safety in Toys

New Toy Safety Regulation (EU) 2025/2509

- Prohibits:
 - CMRs
 - Endocrine disruptors
 - Substances causing organ toxicity
 - Respiratory or skin sensitizers
 - PFAS
 - Bisphenols
- Limit values for children up to 14
- New migration limits for
 - Heavy metals
 - Monomers (BPA)
 - Allergenic fragrances
- Digital Product Passport (DPP)

Effective date: 1 January 2026



EU Proposed POPs Amendments

Long-chain perfluorocarboxylic acids (PFCAs)

- UTC limit of 0.025 mg/kg for PFCAs & salts
- UTC limit of 0.26 mg/kg for compounds
- exemptions for spare parts until Dec 2030

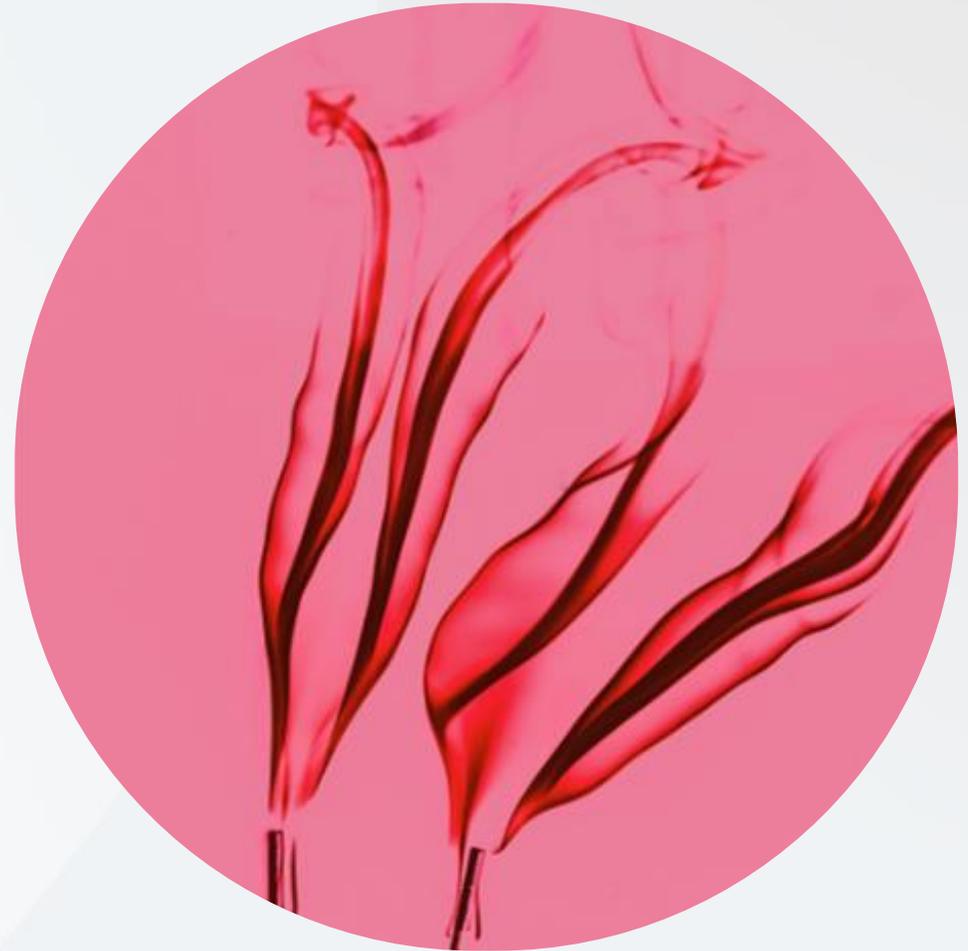
Medium-chain chlorinated paraffins (MCCPs)

- UTC limit of 0.1% by weight
- exemptions w/ less release and exposure

Chlorpyrifos

- UTC limit of 0.01 mg/kg
- no exemptions

Comments due: 19 December 2025



Latvia Regulates Products Containing Hazardous Chemicals

- Aligns to EU directives
- Establishes use, handling, and labeling
- Sets out harmful goods and limits
- Focus on equipment using PCBs/PCTs:
 - Prohibits new installations
 - Requires registration, labeling, and reporting above 5 dm³
 - Sets decontamination, storage, and disposal obligations
 - Prohibits reuse
 - Mandates clear permanent marking
- Integrates EU battery labeling for:
 - Built-in portable
 - Light-mobility

Effective date: 12 December 2025



Switzerland Amends Chemical Ordinance

PFAS & POS substances:

- Expanded controls
 - Strict limits
 - Prohibitions
- Now includes:
 - Dechlorane plus
 - Methoxychlor
 - UV-328
- Provisions introduced for PFHxA in:
 - Cosmetics
 - Textiles
 - Leather
 - Food-contact materials
 - Mixtures for general use

Other:

- Microplastic restrictions
- Lead limit in PVC mixtures
- Formaldehyde emission standards for:
 - Wood products
 - Furniture
 - Vehicle interiors
- Updated controls on:
 - Halogenated organics
 - Ozone-depleting substances
 - REACH authorization substances

Effective date: 1 December 2025

Draft SVHC Recommendations



Proposed Substances:

- DOTE
- Reaction mass of DOTE and MOTE
- Tetraethyllead

Proposed Timeline:

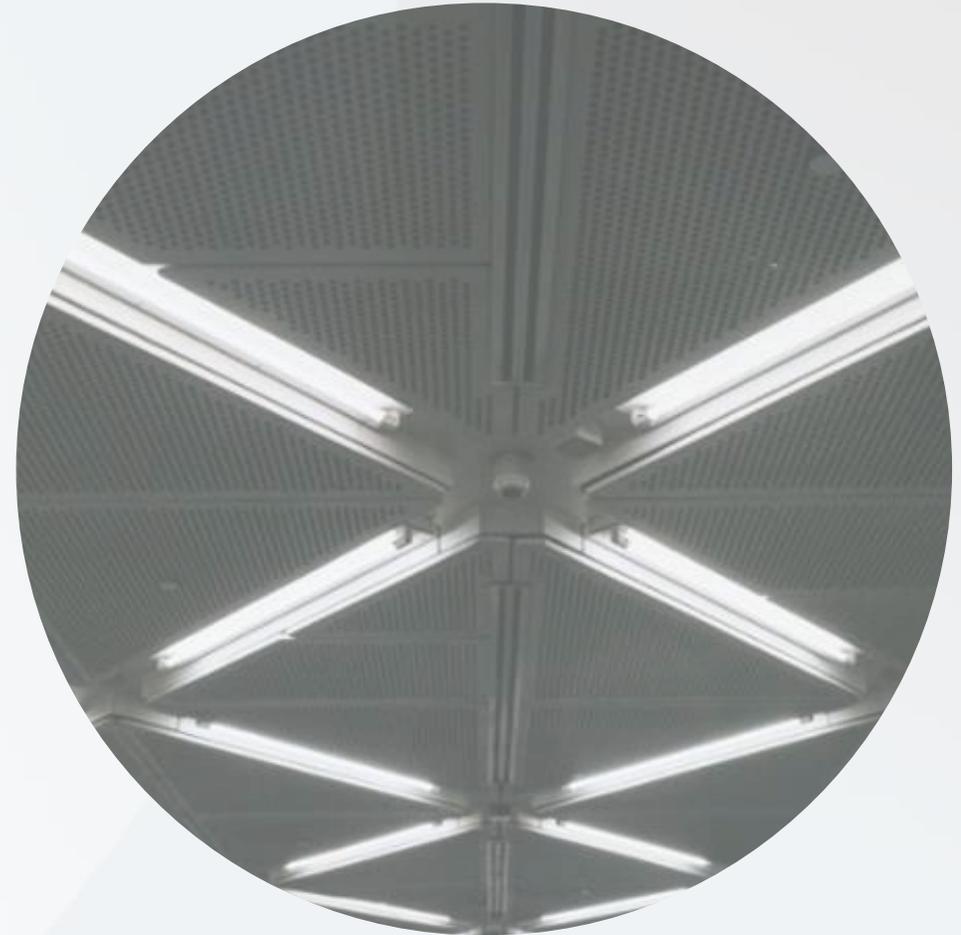
- 18-24 months
- Comments due by **4 February 2026**



UK Mercury Regulations

Mercury Added Products phase-outs:

- Switches and relays
- Fluorescent lamps:
 - Compact (CFLs)
 - Linear (LFLs)
 - Non-linear (NFLs)
 - Cold cathode (CCFL)
 - External electrode (EEFL)
- Strain gauges
- Transducers, transmitters & sensors
- Vacuum pumps
- Tire balancers / wheel weights
- Photographic film / paper





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Asia



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China Drafts Cosmetic Material Registration Revisions

Required Documents for New Raw Materials:

- Name, address, contact information
- Research report
- Data on:
 - Preparation process
 - Stability
 - Quality control standards
- Safety assessment data

Labels Should Include:

- Name of the responsible person
- Chinese ingredient name
- International Nomenclature Cosmetic Ingredient (INCI)
- The production & expiration date
- Storage conditions

Comments due: 25 January 2026

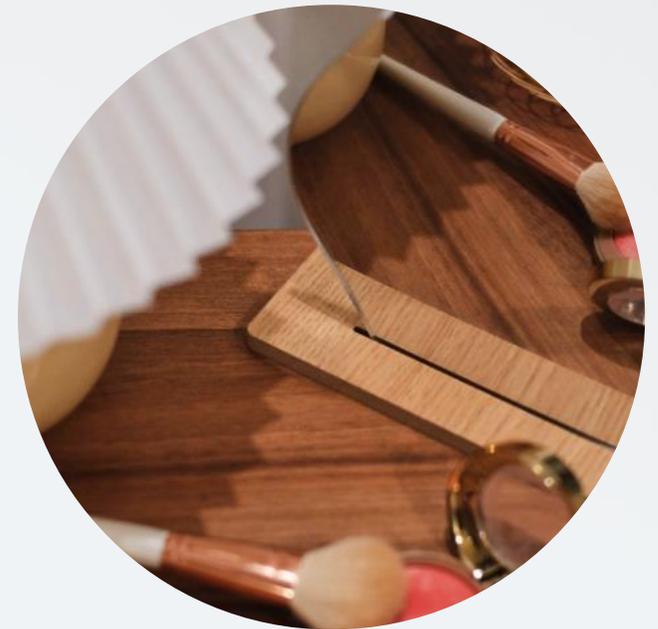
China Proposal for Control of Mercury-Added Products

Phase-outs:

- Dec 31, 2025 - button cell batteries, cosmetics/soaps, and switches
- Dec 31, 2026 - high-mercury fluorescent lamps
- Dec 31, 2027 - triband phosphor fluorescent lamps

The use of mercury in polyurethane production and larger assembled goods would also be prohibited.

Comments due: 17 November 2025



China RoHS

Proposed Catalogue Adds:

industrial washing machines air purifiers water dispensers dishwashers electric ovens microwave ovens electric rice cookers	vacuum cleaner robot vacuum cleaners gas water heaters laser TV projectors image video cameras smart speakers	electronic smart locks printing machines power adapters servers networking equipment smart watches/ bands headphones	mobile power supplies desk lamps electric toys blood pressure monitors blood glucose meters hearing aids
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Outlines Exemptions for:

- Lead
- Cadmium
- Mercury
- Hexavalent chromium
- Phthalates

Exemptions:

- Expiry date of Jul 2027
- Reorg for mercury in lighting
- Lead in steel, aluminium and copper alloy
- Phthalates for recycled components

China RoHS Cont.

GB/T 26572-2011 → GB 26572-2025

New EEE

- Nov 2025 - Dec 2025 = GB/T 26572-2011, GB/T 26572-2011+A1, or GB 26572-2025
- Jan 2026 - Jul 2027 = GB/T 26572-2011+A1 or GB 26572-2025
- Aug 2027 = GB 26572-2025

Existing EEE

- GB/T 26572-2011 = convert before Jan 2027
 - based on either GB/T 26572-2011+A1 or GB 26572-2025
- GB/T 26572-2011+A1 = convert to GB 26572-2025
 - done through a natural transition method

India Drafts PFAS / BPA in FCM Bans

FSSAI proposes Amendment to ban:

- PFAS used in manufacturing of FCM
- Bisphenol A (BPA) and its derivatives

Comments due: 10 December 2025



Japan Chemical Substances Control Law

Proposed Designations:

- Class I (prohibited)
 - chlorpyrifos
 - medium-chain chlorinated paraffins
 - long-chain PFCAs

Comments due: 1 November 2025

Proposed Import Bans:

Chlorpyrifos

- Wood insecticides

Medium-chain chlorinated paraffins

- Plasticizers
- Flame-retardants
- Lubricants
- Paints
- Fillers
- Water-repellents

Long-chain PFCAs

- Photographic film
- Lubricants
- Paints
- Waxes
- Water / oil repellents
- Treated fabrics
- Clothing
- Floor coverings
- Fire-fighting agents

Japan Chemical Substances Control Law cont.

Approval to add PFHxS to Class 1

Import bans:

- Water / oil repellent textiles
- Semiconductor processing
- Surface treatments
- Fire-fighting foams
- Treated clothing and floor coverings

Effective Date: 17 June 2026



Philippines Draft PICCS Additions

Proposal to add 59 new substance to PICCS:

- "New" → "existing" status
- No longer require permits for future import



Singapore Updates Cosmetic Regulations

Aligning with the ASEAN Cosmetic Directive

● Expands bans:

- Nickel compounds
- 2-Chloracetamide
- Quinoline
- Petroleum and coal tar derivatives

● Methyl-N-methylantranilate:

- 0.1% in leave-on products
- 0.2% in rinse-off products
- 0% in products for UV exposure

● Octocrylene:

- 9% in propellant spray products
- 10% in other products
- Trace levels of Benzophenone

● Preservatives:

- Prohibited unless max formaldehyde < 0.1% w/w
- Ammonium silver zinc aluminum silicate restricted to
 - 1% in powder foundations
 - 2% in deodorants, with nitrosamine (50 µg/g)

Effective date: 1 December 2025

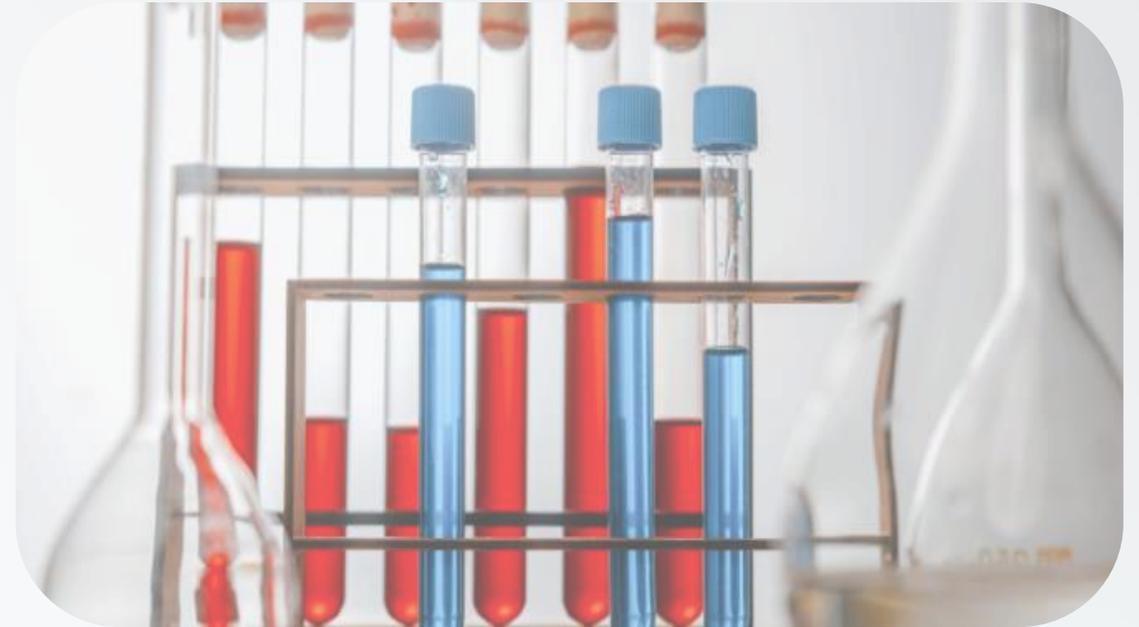


South Korea K-REACH Amendments

Key Changes:

- Consolidated import reporting
- New agent succession rules
- Strict exemption timelines
- Deadlines for priority substances
- Safety status updates
- Immediate enforcement

Effective date: 15 October 2025

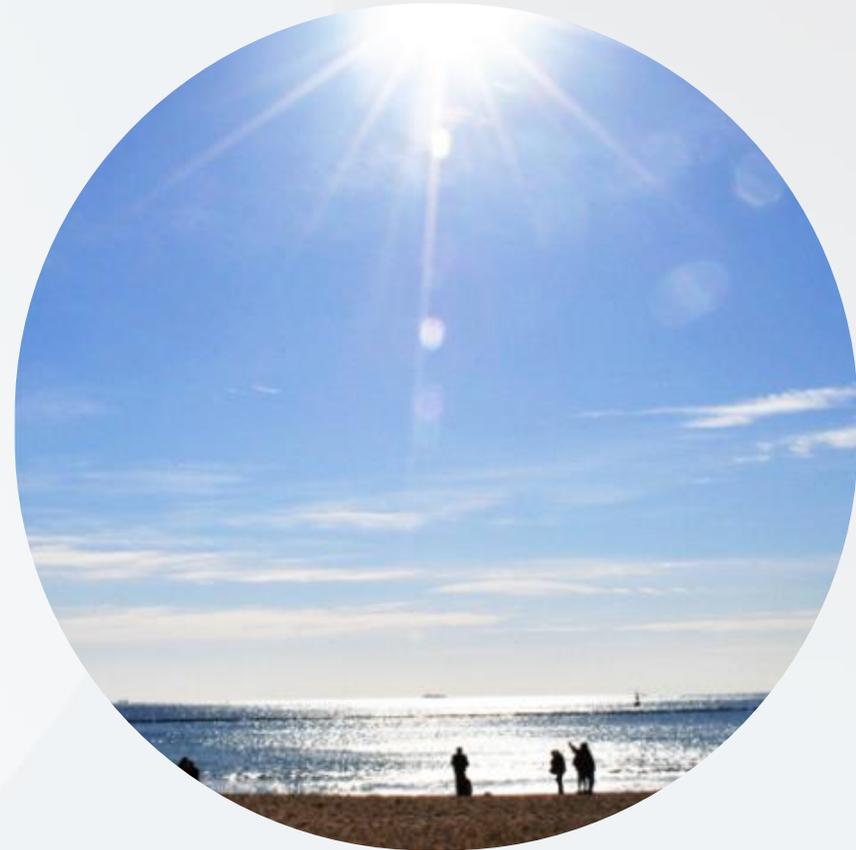


Taiwan Drafts Updates for Toxic Chemicals

Proposed Changes:

- Adding DDT, Dechlorane Plus, and UV-328
 - Banning DDT, Dechlorane Plus
 - Controlling UV-328
- Aligning mercury rules to Minamata
- Prohibiting tetrachloroethylene

Comments due: 5 January 2026



Vietnam Law on Chemicals

Guidance on the Implementation

- Classification & management
- Labelling
- Content & format SDS
- Administration

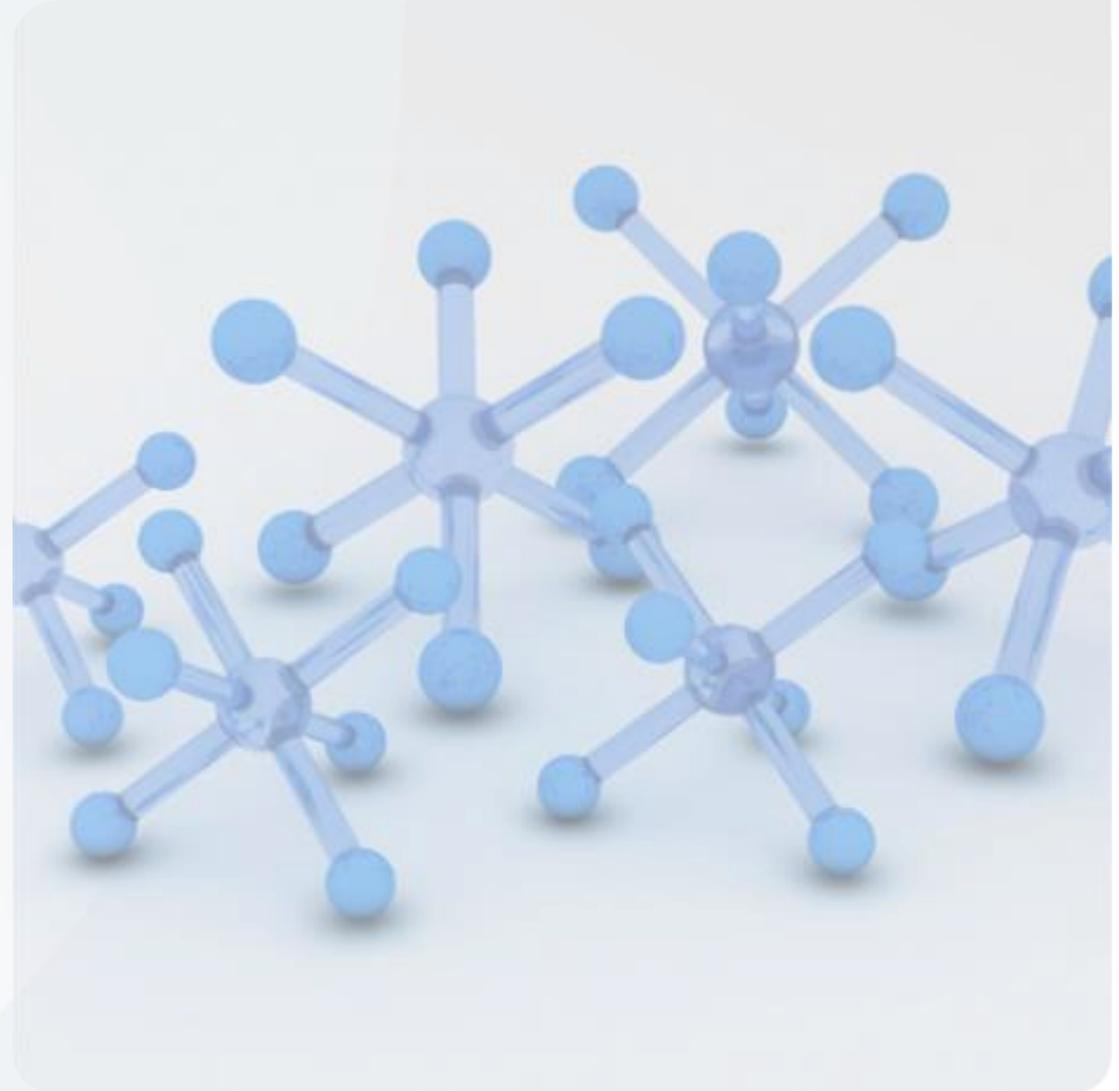
Chemical Consulting Certification

- Standardized codes and forms

Chemical Incident Prevention and Response

- Drills & procedures
- Documentation
- Management responsibilities

Comments due: 15 November 2025



Questions?



Lets Talk



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