

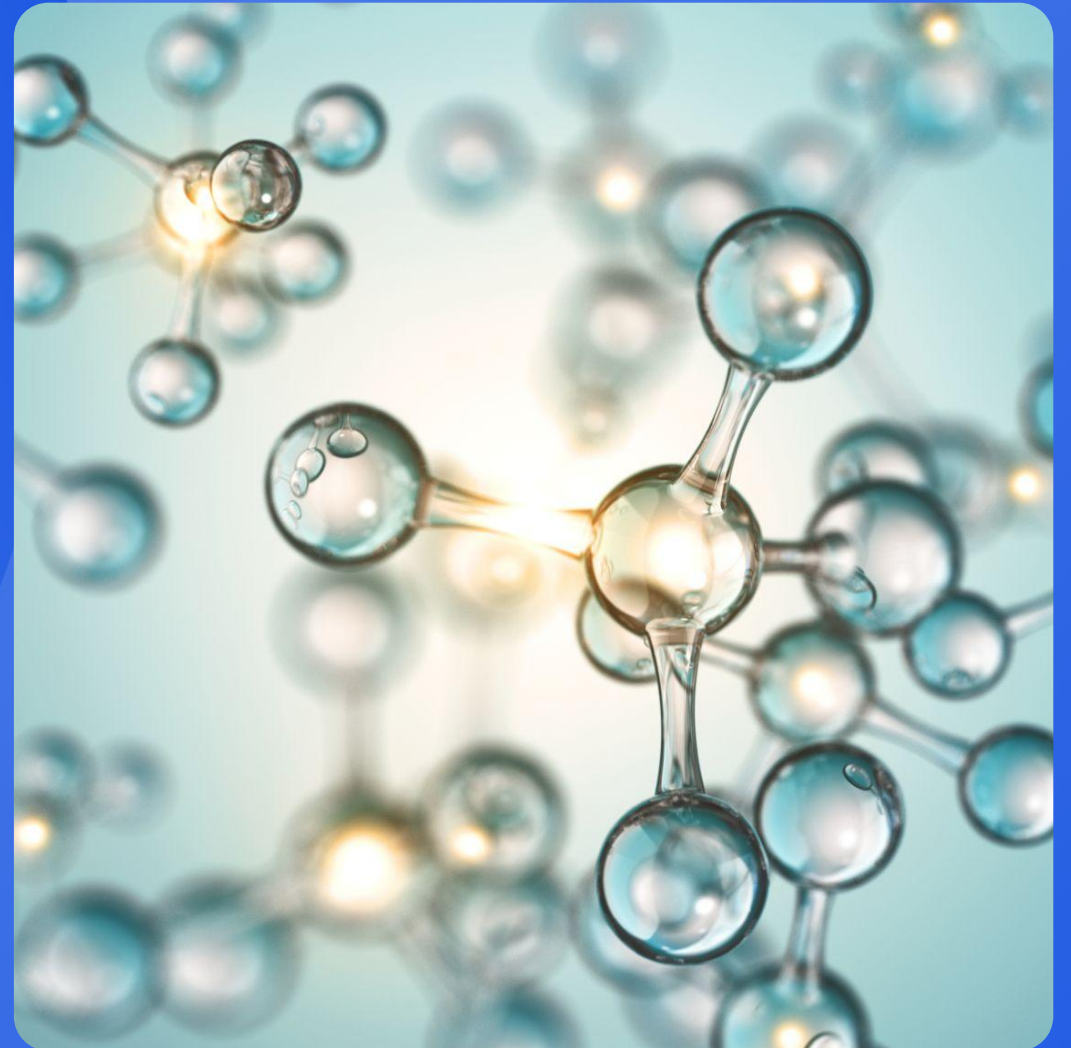


Compliance & Risks

Webinar

Chemicals Quarterly **Q1 2026 Regulatory Update**

22nd April, 2026



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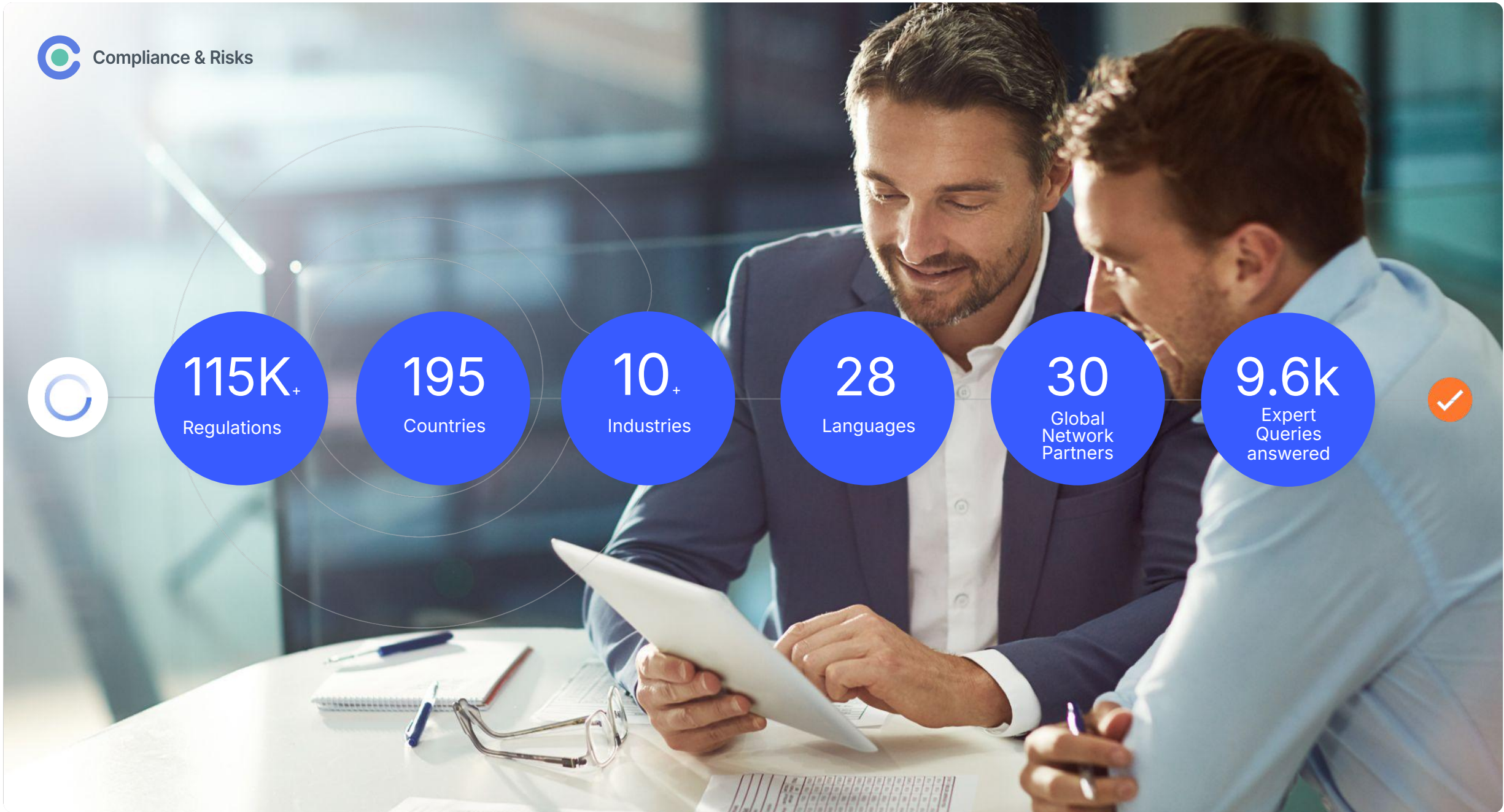
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Agenda

- 01. South America**
- 02. North America**
- 03. Australia**
- 04. Europe**
- 05. Africa/Middle East**
- 06. Asia**





South America



Brazil proposes PL 268/2026



- Targets children's cosmetics specifically
- Amends Law No. 6360, 1976
- Endocrine-disrupting substances
 - Mercury
 - Parabens
 - Lead
 - Phthalates
 - Bisphenol A
- Ban would enter into force after 180 days



Upcoming Chile Deadline



- **30 August 2026:** Mandatory re-notification of industrial hazardous substances first reported in 2024
- Applies to hazardous substances manufactured or imported in volumes exceeding 1 ton per year during the 2024–2025 period.
- New substance notification is required for those that didn't report in 2024
- <https://plataformasqi.mma.gob.cl/>



Upcoming Colombia Deadline



- **30 September 2026:** Mandatory update for substance registered in May 2025
- Applies to substances manufactured or imported in volumes in 2025 calendar year.
- New substance notification is required for those that didn't report in May 2025
- <https://insqui.sical.gov.co/Dashboard.html>



Peru Publishes "REACH" Framework

Supreme Decree N° 005-2026-MINAM

- **Published:** 8 April 2026
- Enters into force six months following publication
- Establishes a transitional period from 1 January 2028 to 30 September 2031, allowing industry time to adopt GHS standards and notification requirements.
- Phased mandatory notifications for existing substances
 - Anticipated Hazard Classification List (LCA) by September 2028
 - Other classifications by September 2029
 - Non-listed hazardous substances by September 2030

Full enforcement of environmental obligations begins on 1 January 2032, with fines for non-compliance reaching up to 30,000 UIT.



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North America

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Guatemala Drafts Broad Regulations

Shift to Mandatory Pre-Market Notification

- Draft regulations would replace fragmented standards with a unified framework covering pharmaceuticals, chemical precursors, pesticides, cosmetics, and medical devices.
- Shifts from post-import inspection to a rigorous entry requirement involving technical dossiers, conformity certificates, and traceability
- Provides government agencies an 18-month window from the adoption date to rectify existing regulations and establish the necessary enforcement infrastructure
- **Final date for comments: 12 May 2026**

Mexico General Health Law



- Would amend Article 271 Bis establishing requirements for cosmetic products
- Prohibition of:
 - Formaldehyde
 - 1,4-dioxane
 - PFAS
 - Trimethylbenzoyl diphenylphosphine oxide
 - dimethyl-p-toluidine



US EPA Stays Busy in Q1

Replacement Parts Exemptions

- Provisions to maintain upstream supply for chemicals for replacement parts included

Formaldehyde Emissions Updates

- ISO 12460-2:2024 added as quality control test method

Animal Testing goals for TSCA and FIFRA

- Elimination all mammalian animal testing by **2035**

Health and Safety Data Reporting Rule deadline extension

- Proposed extension to **21 May 2027** for:
Acetaldehyde, Acrylonitrile,
2-anilino-5-[(4-methylpentan-2-yl)amino]cyclohexa-2,5-diene-1,4-dione, Benzenamine, Benzene, Bisphenol A, Ethylbenzene, Hydrogen fluoride, 4,4-Methylene bis(2-chloraniline), N-(1,3-Dimethylbutyl)-N'-phenyl-p-phenylene diamine, Naphthalene, Styrene, 4-tert-octylphenol, Tribromomethane, Triglycidyl isocyanurate, Vinyl Chloride

PFAS in the US



- TSCA 8(a)(7): Submission period opens **31 January 2027** or **60 days post-finalization** of the forthcoming supplemental rule
- TRI List Expansion: Sodium perfluorohexanesulfonate (PFHxS-Na) added to the Toxics Release Inventory
 - Begins **2026 reporting year**



S. 4153 Reintroduced

Forever Chemical Regulation and Accountability Act of 2026

- Total prohibition of all "non-essential" PFAS manufacturing and use by **10 April 2036**
- Category-specific bans on carpets, rugs, fabric treatments, and food packaging containing PFAS effective **15 April 2027**
- Final EPA rule within 3 years requiring annual disclosure of chemical identity, molecular structure, and environmental release volumes.
- Discharges above detectable thresholds to the environment are prohibited starting **15 April 2036**
- Every manufacturer and user must submit a comprehensive, publicly available 10-year phase-out schedule to the EPA by **15 April 2029**

House (and states) propose restrictions

Hair Products



- Formaldehyde or formaldehyde-releasing substances in straightening and smoothing products classified as adulterated cosmetics
- Differs from recently enacted NYS legislation that imposes a warning label requirement
- Would come into effect **180 days following enactment**

Colorado proposed House Bill 26-1135 this quarter; would impose a warning requirement

New Jersey's Senate Bill 2275 would prohibit certain chemicals in synthetic hair products



California

"Priority Product" Proposals

- Manual Dish Detergents and Shampoos
 - Containing 1,4-dioxane at concentrations greater than 1 ppm
 - **Deadline for comments: 2 March 2026**
- Skin-applied leave-on products
 - Containing butylparaben and formaldehyde-releasing preservatives
 - **Deadline for comments: 31 March 2026**

Candidate Chemicals List

- Ammonium bisulfite
- Chromic acid
- Oxalic acid
- Sulfamic acid
- Ammonium hydroxide
- Ammonium thioglycolate
- Calcium hydroxide
- Ethanolamine
- Guanidine carbonate
- Lithium hydroxide
- Potassium hydroxide
- Sodium hypochlorite

Deadline for comments: 30 March 2026

Minnesota PFAS Reporting

House File 4257

- Intentionally added PFAS reporting deadline push to **1 July 2027**
- Unidentifiable uses clarified: heating and cooling, ventilation, veterinary products and others
- Permissible uses clarified: motor vehicles, aircraft, semiconductors, and others
- Acceptable uses in products composed of multiple components

Portal Launch

- The MPCA's PFAS Reporting Information System for Manufacturers (PRISM) is online and available: <https://prism.theic2.org/>
- **Fee = \$800**
- **Reports due: 1 July**

PFAS Rule Approved



- **Label:** Clear, 10 pt font, Erlenmeyer flask outline
- Labeling and reporting requirements: **1 January 2027**
- **1 January 2027:** Prohibition of cookware, food packaging, dental floss, juvenile products, and firefighting foam with intentionally-added PFAS
- **1 January 2028:** Prohibition of carpets/rugs, cleaning products, cosmetics, fabric treatments, feminine hygiene products, textiles, textile furnishings, ski wax and upholstered furniture with intentionally-added PFAS
- **1 January 2032:** Prohibition of all non-exempt products with intentionally-added PFAS



PFAS Bills Introduced this Quarter

State	Bill Number	Products
Maryland	SB 686	cleaning products, cookware, cosmetics, PCP, feminine hygiene products, juvenile products, fabric treatments, ski wax, textiles, textile furnishings, upholstered furniture, and paint
Michigan	SB 816	apparel, carpets or rugs, cleaning products, cookware, dental floss, fabric treatment, children's products, menstruation products, textile furnishings, ski wax, upholstered furniture, turnout gear, adult mattresses
Missouri	HB 2400	carpets or rugs, cleaning products, cookware, cosmetics, dental floss, fabric treatments, juvenile products,, menstruation products, textile furnishings, ski wax, upholstered furniture
New Jersey	SB 4057	exemption of rugs and fabric for use in vehicles
Ohio	HB 743	carpets/rugs, cleaners, cookware, cosmetics, dental floss, fabric treatments, juvenile products, feminine hygiene products, textile furnishings, ski wax, upholstered furniture
Rhode Island	HB 7621	exemption of cookware authorized by the FDA for food contact for consumer goods

Cosmetics Bills Introduced this Quarter

State	Bill Number	Details
Maryland	SB 656/HB 1533	enforcement and penalties
New Jersey	SB 2946	1,4-dioxane
New Jersey	AB 2063	dibutyl phthalate, toluene, and formaldehyde in nail products
Virginia	HB 122 (incorporates HB 864)	dibutyl phthalate, diethylhexyl phthalate, formaldehyde, paraformaldehyde, methylene glycol, quaternium-15, mercury, isobutylparaben, isopropylparaben, m-phenylenediamine and its salts, o-phenylenediamine and its salts, PFAS and their salts

State Microplastics Proposals

Vermont SB 274

- **1 January 2029:** Prohibition of intentionally added plastic microbeads in all personal care and designated cleaning products
- **1 January 2030:** Ban on manufacturing or distributing medical solution containers containing intentionally added DEHP
- **1 January 2035:** Final restriction phase-out for medical tubing manufactured with intentionally added DEHP

Rhode Island SB 2534

- **1 January 2030:** Prohibition of *any product* containing intentionally added synthetic polymer microparticles

Notable Heavy Metal Proposals

State	Bill Number	Details
Minnesota	SF 4679	mercury in batteries
New Jersey	SB 2075	lead, mercury, and cadmium in products intended for children under six years of age
New Jersey	SB 2660	jewelry that contains > 0.03% cadmium by weight
Washington	SB 5975	lead in cookware

Notice No. 22294



- Mandatory reporting required for nanomaterial applications **exceeding 100 kg annually**, with tiered data requirements escalating at 1,000 kg and 10,000 kg
- Any use or distribution of the substance in consumer products applied as a spray, mist, or aerosol is classified as a Significant New Activity
- Notifications must include comprehensive nano-specific physico-chemical profiles, toxicological data, and detailed exposure assessments to identify potential adverse effects
- **Effective date:** 7 March 2026



New Authorizations in Canada

Ministerial Condition No. 22407

- Siloxanes and Silicones, di-Me, Me 3-(2-oxiranylmethoxy)propyl, Me 3,3,3-trifluoropropyl
- Effective: [27 January 2026](#)

Ministerial Condition No. 22313

- Phenol, methylstyrenated
- Effective: [19 February 2026](#)

Notifiers must submit comprehensive process data to the Minister at least **120 days prior to domestic manufacture**, detailing annual volumes, facility locations, and environmental release points.

Code of Practice for Benzophenone



- Sets a voluntary maximum threshold of 0.2% w/w for benzophenone in consumer-available interior and exterior products
- Participating entities must submit an initial baseline report by **31 March of the year following adoption**, with subsequent reporting **every three years**.

Comments due: 15 April 2026





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Australia/New Zealand

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Proposed Schedule 7 Amendments

- Draft decisions to include PFNS, PFDS, PFHpS and TTBP
- Total ban for industrial applications and consumer products
- Defined thresholds for UTC
- Mandated destruction for waste exceeding specified concentrations
- Anticipated entry into force: **1 January 2027**

Comments due: **24 April 2026**





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Europe

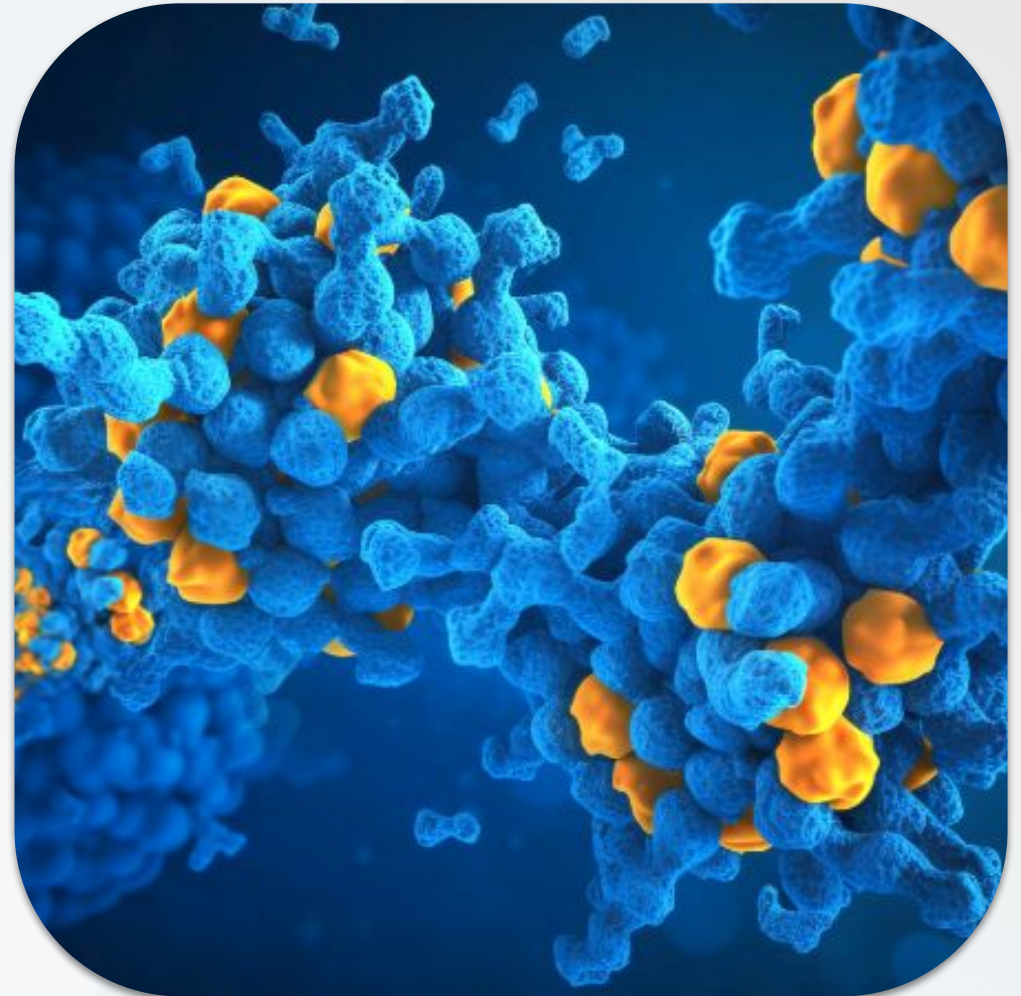


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Proposal to add CMRs

- Harmonized EU classifications
- Accurate CAS for 3 substances and aligned mixture concentration calculations
- New derogations / conditions for Dinitrogen Oxide (N₂O)
- Tiered enforcement from **2026 / 2027**
- Audit for new CMRs, SDS updates, product reformulation requirements

Comments due: **6 February 2026**



Mercury-added Products

- New prohibited list categories
- Covers high-accuracy capacitance bridges and specific RF switches/relays
- Applicable to components with ≤ 20 mg mercury
- Exclusions for R&D products
- Alignment with Minamata

Effective date: 20 March 2026



Allowed Active Substances

- Only articles treated with permitted AS-PT combinations
 - Part 1: Union list, Annex I, or under formal exam
 - fully compliant for use
 - Part 2: Facing withdrawal
 - 180-days from non-approval decision
 - Part 3: AS-PT combinations with valid compliance declarations; legally allowed
- Participant Takeover Opportunities



Europe PFAS Updates

- ECHA's RAC and SEAC confirm EU restriction is necessary and justified
 - **RAC:** complete ban to reduce emissions by 96% / time-limited exemptions "uncontrollable risks"
 - **SEAC:** supports restriction / suggests more derogations and longer transitions
- UKs "PFAS Plan" = three-pillar approach:
 - understanding sources
 - tackling pathways
 - reducing exposure
- EU SEAC consultation closes **May 25, 2026**; UK to review REACH reforms and firefighting foam bans by year-end

UK POPs Amendment

- Proposed addition of MCCPs, LC-PFCAs, UV-328, Dechlorane Plus, and Chlorpyrifos
- Stockholm alignment
- Stricter UTC limits for PFOS and proposed alignment with EU standards for PBDEs
- New chemical-specific UTC limits (e.g., 0.025 mg/kg for LC-PFCA salts)
- Anticipated entry into force: **16 December 2026**

Comments due: **13 May 2026**



Swiss ORRChem: PFAS & Mercury Amendments

- Draft aligns with EU REACH and Stockholm/Minamata
- Restricted to 25 ppb:
 - Chlorpyrifos
 - MCCPs
 - Long-Chain PFCAs
- Gradual phase-out for MCCPs in aerospace, defense, and adhesives
- Mercury bans
- Expanded PFOA, PFOS, and PFHxA restrictions in FCM and single-use items (>25 ppb)





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Africa/Middle East

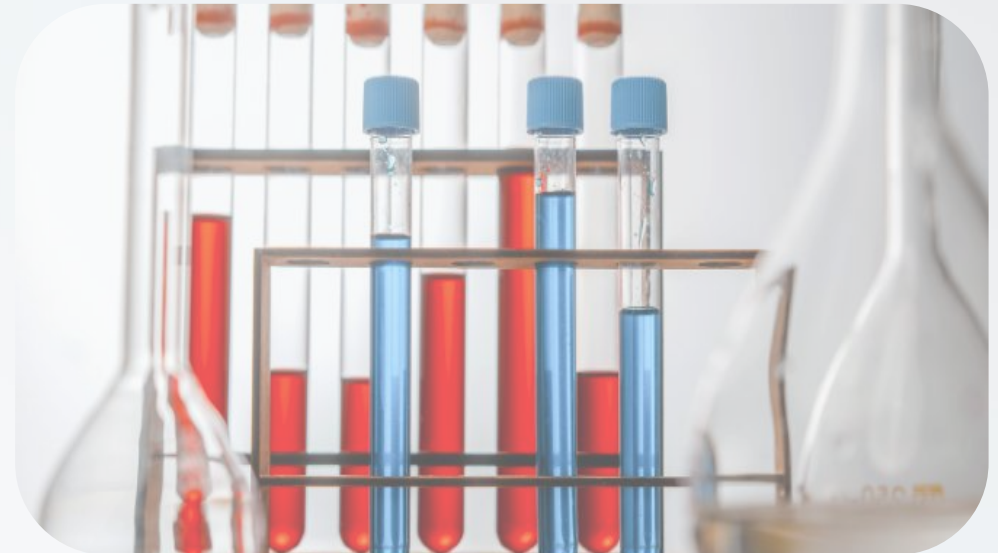


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Saudi Arabia Restricted Substances Update

- Decision No. 3090 adds new RS entries
- Hazardous substances used in explosive compositions
- Precursors for psychotropic and narcotic substances
- Strict oversight for dual-use chemicals, including Acetone, Toluene, and Hydrochloric Acid

Effective date: 5 January 2026





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Asia



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China Drafts New Cosmetic Safety Framework

- Update of [GB 7916](#)
- Toxicological safety assessments required
- Specialized thresholds for eye, lip, and children's products (≤ 100 CFU/g)
- Products for children to meet specific provisions
- Adherence to GMP and mandatory ingredient identification (CAS, INCI, Latin names)
- Expansion of prohibited substance (Appendices A & B)
- Mandatory compliance for restricted UV filters / dyes

Comments due: [18 May 2026](#)

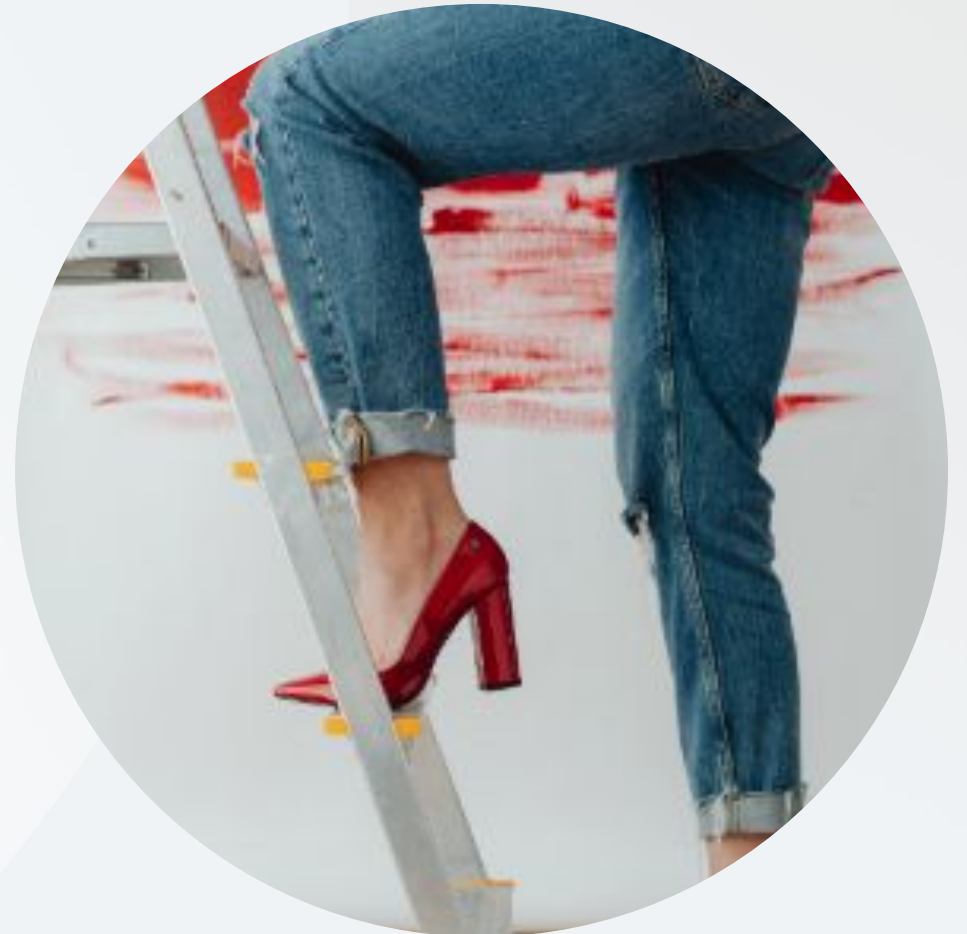


Japan

Updated Testing for Household Products

- Proposed updates to analytical methods for Organotin / Organic Mercury compounds
- Allowing nitrogen or hydrogen in Gas GC
- Replace carbon tetrachloride with safer Cyclohexane/Ethyl Acetate mixture for mercury detection
- Applies to textiles, adhesives, paints, waxes, and shoe care
- Proposed adoption: **1 April 2027**

Comments due: **3 April 2026**



Thailand FCM & rPET Updates

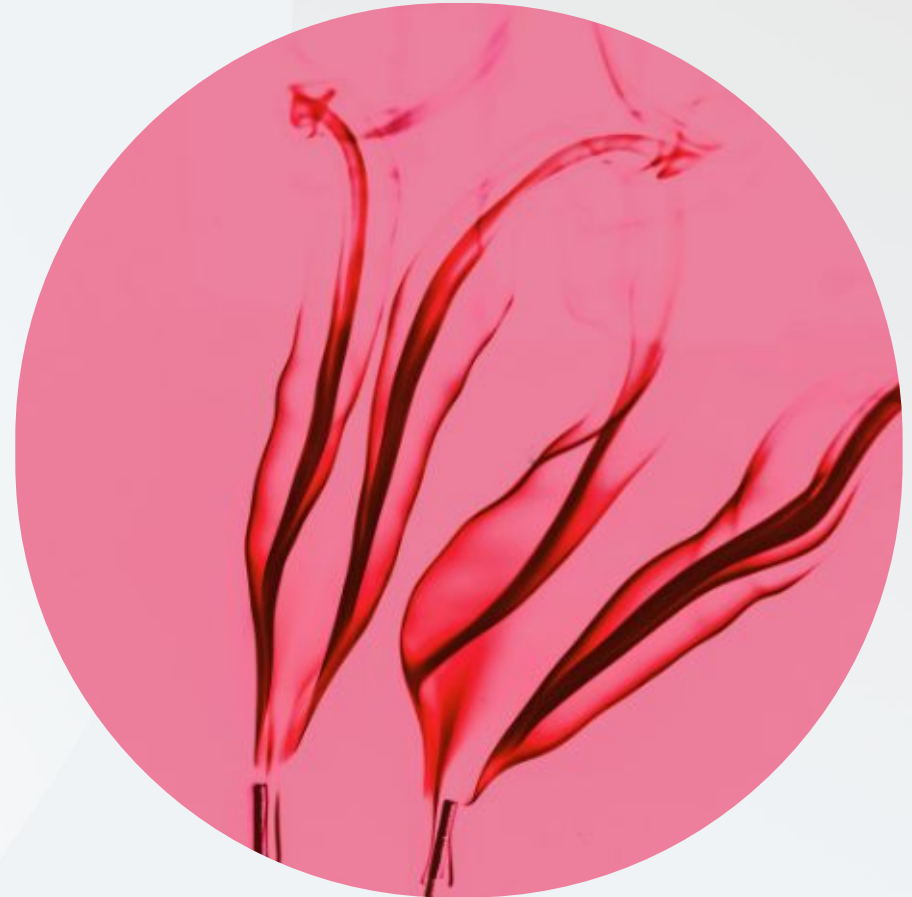
- New [TIS 4674-2568](#) regulates recycled PET containers
- Identical to ISO for metal ion, lead, cadmium from ceramics, glass, enameled ware
- Precise lab protocols mandatory for cookware, dinnerware, glass hollowware
- Proposed 365-day extension for Food Contact Paper ([TIS 2948](#)) to [June 2027](#)
- Draft inspection rules for Cooking Paper ([TIS 3438](#))
GMP/HACCP certs for licensing
- Mandatory QR codes / standard marks



Singapore Phase-Out of POPs

Stockholm Convention Alignment

- Mandatory phase-out of: Chlorpyrifos, MCCPs, Long-Chain PFCAs
- Prohibited from **16 December 2026**
- Existing stocks may be exhausted; no new entries permitted post-deadline
- Specific HS and product codes listed to facilitate supply chain identification



Taiwan Mercury Ban Expansion

Proposed Changes:

- Addition of new categories
- Phase-Out:
 - **May 2026:** Immediate ban on industrial/scientific tools and lighting
 - **Jan 2027:** CFLs, general-purpose FLs
 - **Jan 2028:** triband phosphor fluorescent lamps
- Potential allowances for cases where no alternative
- Import permits require approval / adherence to Minamata
- proposed entry into force **May 1, 2026**

Comments due: **13 April 2026**



Cosmetic Regulatory Updates

- **UK, Malaysia,** and **EAEU** are banning 3-MBC/2-Methylbenzylidene Camphor; **Malaysia** has immediately banned Miconazole
- **EAEU** proposing new caps on Retinol (Vitamin A), Kojic Acid, and Arbutin, including mandatory "Contains Vitamin A" labeling
- **South Korea** adding Phenylene Bis-Diphenyltriazine and Tris-Biphenyl Triazine, while removing Henna/DHA mixtures
- **UK** lowering the warning threshold for formaldehyde-releasing preservatives to 0.001% effective **July 2026**
- **EAEU** and **South Korea** introducing specific restrictions for aerosols, sprays, and nanomaterials (e.g., Nano Copper, Hydroxyapatite)
- Enforcement dates fall between **March** and **August** extending into **2028**



Questions?



Lets Talk



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