



Dear CDX User,

At CDX, we're more than just a software solution - we're your partners in navigating the complex world of regulatory compliance. We understand that staying ahead of evolving regulations can be challenging. That is why we go above and beyond to support our customers.

Our commitment to your success extends far beyond system enhancements. We regularly host webinars featuring external experts, create comprehensive whitepapers and factsheets, and timely regulatory updates to ensure you remain informed and prepared. Our goal is to equip you with the knowledge and tools needed to confidently tackle regulatory challenges that may arise.

As active members of industry-leading organizations like IAEG, AEM, AIAG, and IPC, we ensure that CDX remains at the forefront of industry requirements. We continuously update essential tools such as GADSL, AD-DSL, and RISL to reflect the latest standards. Recently, we've also implemented HEDSL in response to requests from our heavy industry customers, demonstrating our adaptability to your evolving needs.

As we enter Q3 2024, we are excited to share a range of resources aimed at keeping you informed and compliant with the latest regulatory updates. We hope you find these insights valuable and engaging.

We wish you an enjoyable reading experience with our Q3 2024 newsletter. If you find the information useful or have any feedback, we would greatly appreciate it if you could share your thoughts with us at cdx-info@dxccom.com.

Remember, this newsletter is just one way we keep you updated. Our webinars, expert consultations, and continuous CDX enhancements are all part of our commitment to your compliance success in an ever-changing regulatory landscape.

Thank you,

CDX Team

Agenda

CDX News.....	3
Upcoming Webinar: PFAS regulatory update for North America	3
HEDSL now integrated into CDX	3
GADSL and AD-DSL industries lists updated in CDX.....	3
New PFAS Reporting Rules for Canada	4
EU Battery Regulation (2023/1542) added to CDX scope	4
Global.....	5
RMI Announces Key Updates to Mineral Reporting Templates.....	5
Asia	6
China.....	6
China RoHS: China Adds Four Phthalates to RoHS Restricted Substances List (enforced).....	6
Japan	6
CSCL: Japan Proposes Ban on 138 PFAS Chemicals Starting January 2025 (consultation)	6
North America	7
United States.....	7
TSCA: Changes to PFAS Reporting Schedule by the EPA (delay)	7
TSCA: EPA Grants Petition on three PFAS Found in Fluorinated Containers.....	7
California Prop 65: OEHHA Considers Listing BPS as Male Reproductive Toxicant	8
Canada.....	9
CEPA: Canada Announces New PFAS Reporting Requirements (published)	9
Europe.....	10
European Union	10
EU POPs: New EU POP Rules Target HBCDD and Methoxychlor (amendment).....	10
Universal PFAS: Update on PFAS Restriction Evaluation - September 2024 (update).....	11
REACH ANNEX XVII: EU REACH Amendment on PFHxA Restrictions (enforced).....	11
F-gases: EC Publishes Implementing Regulation for F-Gas Labelling (published)	12
EU REACH SVHC Candidate List: Six New Substances Proposed (consultation).....	12
RoHS: Key Changes and Implications (amendment).....	13
EU Battery Regulation: Upcoming Changes (release).....	14
CSRD: European Commission Releases FAQs (update)	15
POPs: Regulatory Update on Dechlorane Plus (consultation).....	15
Marine Equipment Directive Update (EU) 2024/1975 (published)	16
EU REACH Annex XVII: Two New Substances Proposed for Restriction	17
The Ecodesign for Sustainable Products Regulation (ESPR) (published).....	17
The "Right to Repair" Directive (EU) 2024/1799 (published)	18
Great Britain	19
Environment Agency Issues New Guidance on EEE and WEEE Classification (release).....	19

CDX News

Upcoming Webinar: PFAS regulatory update for North America

We're thrilled to invite you to our upcoming webinar on November 20th, 2024, from 4:00 PM to 5:00 PM CET. Our expert panel will provide a comprehensive overview of Canada's upcoming Per- and Polyfluoroalkyl Substances (PFAS) reporting requirements and the recent updates to the US EPA TSCA 8(a)(7). Don't let these regulations catch you unprepared. Register now to secure your spot and stay ahead of the regulatory curve. Full agenda and registration portal are available [here](#).



HEDSL now integrated into CDX

As a leading software provider and active member of the Association of Equipment Manufacturers (AEM), we are proud to announce a significant milestone in compliance reporting for the heavy equipment industry. On July 31, 2024, we successfully implemented the Heavy Equipment Declarable Substances List (HEDSL).

DXC has been actively involved in the formation of HEDSL since its inception and continues to play a key role on the HEDSL committee, including serving as co-chair. This engagement ensures that CDX aligns with the specific needs of the heavy equipment sector.

With this implementation, companies can now easily send requests to their suppliers for substances listed in HEDSL, simplifying the compliance process. This integration marks a significant advancement in streamlining chemical reporting and reducing regulatory burdens across the industry.

For more details on how HEDSL implementation can benefit your business, please visit [the CDX website](#).

GADSL and AD-DSL industries lists updated in CDX

The Automotive and Aerospace and Defence industry have been also very busy in Q3 2024, responding to important regulatory changes. Recent updates to global regulations like EU REACH and US TSCA have prompted revisions to both the Global Automotive Declarable Substance List ([GADSL](#)) and the Aerospace and Defense Declarable Substances List ([AD-DSL](#)).

GADSL was updated in September, while the new AD-DSL version 8.0 was released in August. CDX has been promptly updated to incorporate these changes, ensuring alignment with the latest industry standards.

These updates demonstrate the industry's commitment to adapting to changing regulations. By keeping these lists current, industries help they supply chain ensure compliance with the latest substance restrictions, making it easier for them to navigate their regulatory obligations.

New PFAS Reporting Rules for Canada

Another exciting regulatory development recently implemented concerns per- and polyfluoroalkyl substances (PFAS) reporting requirements in Canada. This new reporting mandate was introduced under the Canadian Environmental Protection Act (CEPA) on July 27, 2024, and came somewhat unexpectedly. The new rule requires any entity that manufactured, imported, or used any of 312 specified substances during the 2023 calendar year to submit detailed reports through Environment and Climate Change Canada's online reporting system by January 29, 2025.

As of September 30th, this regulation has been released in CDX. To simplify the process of meeting the reporting deadline, we suggest using "Where-Used" analysis tools to quickly determine if any products or materials available in CDX contain reportable PFAS substances. In case of insufficient data, users can request detailed information from suppliers about these substances, including quantities and weights.

You can read more about these reporting requirements on our [website](#) and within this newsletter under the section for Canada.

EU Battery Regulation (2023/1542) added to CDX scope

Another exciting regulatory development recently implemented concerns the EU Battery Regulation (2023/1542), with the next set of requirements taking effect on August 18, 2024. This regulation imposes specific limits on hazardous substances in batteries:

- Lead Compounds: Limited to 0.01% by weight in portable batteries
- Mercury Compounds: Limited to 0.0005% by weight in batteries, regardless of incorporation into appliances
- Cadmium Compounds: Limited to 0.002% by weight in portable batteries, regardless of incorporation into appliances

In response to these regulatory needs, as of September 4th, we have integrated the EU Battery Regulation (2023/1542) into the scope of CDX. If you fall within the scope of this regulation, you can collect data from your suppliers to ensure that the batteries they supply meet the respective thresholds. For data you already have within the CDX, we suggest using analysis tools to quickly determine if any products or materials available in CDX or received from suppliers contain reportable substances above the specified limits.

You can read more about the EU Battery Regulation requirements on our [website](#) and within this newsletter under the section for Europe.

China RoHS Expands Phthalate Restrictions

Another significant regulatory update, released alongside the EU Battery Regulation (2023/1542) on September 4th, concerns China RoHS, with new requirements taking effect on January 1, 2026. The update to China RoHS includes restrictions on four additional phthalates:

- Bis(2-ethylhexyl) phthalate (DEHP) - CAS No. 117-81-7

- Butyl benzyl phthalate (BBP) - CAS No. 85-68-7
- Dibutyl phthalate (DBP) - CAS No. 84-74-2
- Diisobutyl phthalate (DIBP) - CAS No. 84-69-5

In response to these regulatory changes, we have integrated these four phthalates into the existing China RoHS Regulation, marking them as exemptions. This means that by January 2026, users will see these phthalates symbolized by an 'e' indicating their exemption status when added to the MDS. This update aligns China RoHS with international standards like the EU RoHS.

If your products fall within the scope of this regulation, which is aligned with international standards like the EU RoHS, the first step is to check whether you have already collected data for these four phthalates. We recommend using "Where-Used" analysis tool to quickly identify any existing data on these substances in your products. For any gaps identified, you should

You can read more about the China RoHS requirements on our [website](#) and within this newsletter under the section for Asia.

Global

RMI Announces Key Updates to Mineral Reporting Templates

The Responsible Minerals Initiative (RMI) has announced significant updates to its reporting templates, reflecting the evolving landscape of mineral sourcing regulations and industry needs. These changes aim to enhance supply chain transparency and support companies in meeting regulatory requirements, particularly in light of the EU Battery Regulation.

AMRT 1.2 Release

The [Additional Minerals Reporting Template \(AMRT\) version 1.2](#), formerly known as the Pilot Reporting Template (PRT), is set to be released on October 4, 2024. This transition marks the template's evolution into a more established reporting tool, allowing companies to collect due diligence information on up to ten minerals not covered by existing templates. The RMI anticipates increased participation with the AMRT as companies conduct their mineral surveys for the 2024 reporting year.

EMRT 2.0 Expansion

In April 2025, the Extended Minerals Reporting Template (EMRT) [will expand to include four new minerals: copper, natural graphite, lithium, and nickel](#). This addition aligns with the requirements of the EU Battery Regulation and aims to assist companies in identifying new facilities within these supply chains.

The incorporation of new minerals into the EMRT directly addresses the reporting needs outlined in the EU Battery Regulation. Companies will now be required to provide detailed reports on their use of these minerals, including sourcing information, recycled content, and comprehensive documentation of due diligence procedures.

These expanded reporting requirements present both challenges and opportunities for companies operating in the EU battery market. A more rigorous approach to supply chain management and

data collection will be necessary, potentially impacting procurement strategies and supplier relationships.

To prepare for these changes, companies should review and update their mineral sourcing policies, enhance their supply chain mapping capabilities, and develop robust data collection and reporting systems. Engaging with suppliers to ensure compliance with new reporting requirements will also be crucial.

By proactively addressing these upcoming changes, companies can position themselves to meet regulatory obligations and demonstrate their commitment to responsible sourcing practices.

Asia

China

China RoHS: China Adds Four Phthalates to RoHS Restricted Substances List (enforced)

On June 29, 2024, China's State Administration for Market Regulation (SAMR) officially approved the first amendment to China RoHS standard [GB/T 26572-2011 "Requirements of Concentration Limits for Certain Restricted Substances in Electrical and Electronic Products"](#). This amendment, effective January 1, 2026, expands the scope of restricted substances to include four additional phthalates, aligning with global standards for electronic products:

- Bis(2-ethylhexyl) phthalate (DEHP),
- Butyl benzyl phthalate (BBP),
- Dibutyl phthalate (DBP), and
- Diisobutyl phthalate (DIBP).

Each of these substances will be limited to a maximum concentration of 0.1% by weight.

This regulatory change requires manufacturers to comprehensively review existing products to identify the presence of these newly restricted phthalates. Companies should promptly update their testing procedures and make necessary adjustments to ensure compliance with the new limits.

With the deadline approaching, manufacturers have until January 2026 to meet these requirements. It is advisable to start preparations now to ensure product compliance when the new regulations take effect. This update brings the total number of restricted substances under China RoHS to ten, aligning it more closely with similar regulations like EU RoHS.

Japan

CSCL: Japan Proposes Ban on 138 PFAS Chemicals Starting January 2025 (consultation)

On September 9, 2024, Japan's Ministry of Health, Labour and Welfare (MHLW), Ministry of Economy, Trade and Industry (METI), and Ministry of the Environment jointly issued a draft proposal to prohibit the manufacture, import, and [use of 138 Perfluoroalkyl and Polyfluoroalkyl Substances \(PFAS\) under the Chemical Substance Control Law \(CSCL\)](#).

The proposal designates these PFAS compounds as Class I Specified Chemical Substances, which would effectively ban their manufacture, import, and use in Japan. This designation includes PFOA isomers, their salts, and PFOA-related compounds.

Key Points of the Proposal:

- Prohibition of Manufacture and Import: The ban will apply to PFOA isomers, their salts, and PFOA-related compounds starting January 10, 2025.
- Ban on Import of Designated Products: Products containing these substances will also be prohibited from import.
- Restriction on Use: Use of these substances will be limited to approved essential applications only.
- Technical Standards: Establishment of technical standards for handling specified products containing these substances.

The ordinance is expected to be adopted in November 2024 and will take effect on January 10, 2025.

With the public comment period now closed as of October 9, 2024, stakeholders should prepare for compliance with the upcoming regulations. Manufacturers and importers are advised to review their product portfolios and supply chains to identify any use of the soon-to-be-restricted substances.

This regulatory change aligns Japan with global efforts to restrict PFAS use and follows the country's earlier actions on related substances like PFHxS. Proactive measures will be essential to ensure compliance by the effective date.

North America

United States

TSCA: Changes to PFAS Reporting Schedule by the EPA (delay)

The U.S. Environmental Protection Agency (EPA) has officially announced a delay in the reporting period for the PFAS TSCA 8(a)(7) Reporting and Recordkeeping Rule. The official announcement can be found [here](#). The start of the reporting window has been moved from November 12, 2024, to July 11, 2025. This change also affects the deadlines for reporting.

For most companies, the new deadline will be January 11, 2026, which was previously set for May 8, 2025. Small manufacturers whose only reportable activity is from article importation will have until July 11, 2026, instead of the earlier deadline of November 10, 2025.

TSCA: EPA Grants Petition on three PFAS Found in Fluorinated Containers

On July 11, 2024, the U.S. Environmental Protection Agency (EPA) [has granted a petition to address](#) three per- and polyfluoroalkyl substances (PFAS) formed during the fluorination of plastic containers:

- Perfluorooctanoic acid (PFOA)
- Perfluorononanoic acid (PFNA)
- Perfluorodecanoic acid (PFDA)

The petition requested that the EPA establish regulations under TSCA Section 6 to prohibit the manufacturing, processing, use, distribution in commerce, and disposal of PFOA, PFNA, and PFDA formed during the fluorination of plastic containers. These fluorinated containers are used for a wide range of products, including:

- Household consumer goods
- Pesticides
- Fuels
- Automotive products

- Industrial products

By granting this petition, the EPA has committed to promptly initiating proceedings under TSCA Section 6. As part of this process, the agency intends to request information on:

On September 30, 2024, the EPA issued [a request for public comment](#) on the manufacture of these PFAS during the fluorination of high-density polyethylene (HDPE) and other plastic containers. The agency is seeking information on:

- The number, location, and uses of fluorinated containers in the United States
- Alternatives to the fluorination process that generates PFOA, PFNA, and PFDA
- Measures to address risks from these PFAS compounds formed during container fluorination

The deadline for submitting comments is November 29, 2024.

This development signals potential new regulations on fluorinated plastic containers. Companies involved in the manufacture, processing, distribution, use, or disposal of these containers may need to prepare for possible adjustments in manufacturing and processing methods, explore alternative materials or processes that do not generate PFAS, and enhance data collection and reporting capabilities related to PFAS in their products and processes.

UN Plastics treaty - US Policy shift

In August 2024 the United States announced to support a global treaty to limit plastic pollution which is a major policy shift from its earlier position. The policy shift aligns the U.S. with so-called high-ambition countries, including EU states, South Korea and Canada calling for a global plastics treaty to cap and phase down plastic production globally. This group also seeks to eliminate harmful chemicals used in plastic production and supports creating a global list of chemicals to be banned or restricted and setting global criteria to phase out avoidable plastic products.

The shift in U.S. position will make it probably more difficult for the blocking countries to continue to oppose meaningful action, and it might encourage other (undecided) countries to take more ambitious approaches such as a global list of chemicals. This will likely influence the final round of treaty negotiations in Busan, South Korea end of November.

California Prop 65: OEHHA Considers Listing BPS as Male Reproductive Toxicant

The California Office of Environmental Health Hazard Assessment (OEHHA) is set to hold an important meeting regarding bisphenol S (BPS) and its potential classification as a male reproductive toxicant under Proposition 65. Currently, BPS is already listed for female reproductive toxicity, but this upcoming evaluation will focus on its effects on male reproductive health.

The Developmental and Reproductive Toxicant Identification Committee (DARTIC) will convene on December 12, 2024, to discuss this matter. In preparation for the meeting, OEHHA has opened a 45-day public comment period on the hazard identification document titled "[Evidence on the Male Reproductive Toxicity of Bisphenol S](#)." Stakeholders and interested parties are encouraged to submit their comments by November 12, 2024.

The DARTIC plays a crucial role in advising OEHHA on compiling the list of chemicals known to cause reproductive toxicity under Proposition 65. This evaluation process follows a request for

relevant information that was open from March to April 2022, during which OEHHA received one submission that will be considered in the upcoming discussions.

If BPS is ultimately listed as a male reproductive toxicant, businesses using this chemical may face new compliance requirements. Companies could be required to provide clear warnings for products containing BPS, evaluate alternatives, or reformulate their products to avoid these requirements altogether. It's essential for businesses to stay informed about this development and consider participating in the public comment period if they have relevant insights or scientific data.

For more detailed information about the upcoming DARTIC meeting, the public comment period, and the potential listing of BPS as a male reproductive toxicant under Proposition 65, interested parties can visit [the OEHHA website](#).

Canada

PFAS: Updated Draft State Report and Revised Risk Management Scope

On July 13th the Government of Canada has published an updated [Draft State of PFAS Report](#). This report is a qualitative assessment of the fate, sources, occurrence, and potential impacts of PFAS on the environment and human health, including the basis for a class-based approach and application of precaution, to inform decision-making on PFAS in Canada. The update is reflecting feedback from the public consultation on the initial May 2023 report. The report is summarizing relevant information on the class of PFAS, recently excluding fluoropolymers- a specific type of PFAS, to support a proposed conclusion under section 64 of CEPA and decision-making on PFAS in Canada. It proposes that the class of PFAS, excluding fluoropolymers, is or may be entering the environment at harmful levels to human health and the environment. Consequently, the Ministers of Health and the Environment recommend adding this class of PFAS, excluding fluoropolymers, to Part 2 of Schedule 1 of CEPA (toxic substance list). Preventive or control actions such as regulations, guidelines or codes of practice, are then considered for any aspect of the substance's life cycle from the research and development stage through manufacture, use, storage, transport and ultimate disposal or recycling.

The revised [Risk Management Scope](#) document is outlining risk management options to ensure effective, coordinated, and consistent risk management decision-making. It proposes a phased approach, starting with a regulation to restrict PFAS not already regulated in firefighting foams, followed by additional measures to prohibit other uses or sectors in relation to PFAS.

PFAS meeting the definition of fluoropolymers, as defined in the Updated Draft State of PFAS Report, are not addressed within the Revised Risk Management Scope and are planned for consideration in a separate assessment. The updated Documents align with evidence suggesting that fluoropolymers may have different exposure and hazard profiles than other PFAS. This assumption is in discussion worldwide, but currently no other country or region has officially excluded the group of fluoropolymers from the group of PFAS.

PFAS: Canada Announces New PFAS Reporting Requirements (published)

Environment and Climate Change Canada has introduced [a mandatory reporting rule for per- and polyfluoroalkyl substances \(PFAS\)](#). This new requirement applies to 312 specific PFAS compounds

that were manufactured, imported, or used in Canada during the 2023 calendar year. The reporting deadline is set for January 29, 2025.

The rule is applicable to companies that manufactured, imported, or utilized PFAS above certain thresholds in 2023. Organizations will need to submit their information through Environment and Climate Change Canada's online reporting system. Required data includes details such as quantities, uses, concentrations, and technical information for each reportable PFAS.

To assist companies in navigating these new requirements, [a guidance manual has been provided](#). This manual helps determine if a company is subject to the notice and offers assistance with completing the various sections. It's important to note that companies are required to provide reasonably accessible information - this includes information that a company possesses or to which it may be reasonably expected to have access.

With a short six-month window to gather and report the necessary information, companies must act quickly. While this requirement is mandatory for Canadian entities, it is expected to impact global supply chains as businesses in Canada seek PFAS data from their suppliers.

This initiative aligns with broader North American efforts to assess and manage PFAS risks. However, Canada's approach differs from the U.S. EPA's TSCA reporting rule in both scope and timeline. Companies engaged in business within Canada should review these requirements promptly to ensure compliance by the January 2025 deadline.

Europe

European Union

EU POPs: New EU POP Rules Target HBCDD and Methoxychlor (amendment)

The European Commission has taken significant steps to strengthen regulations on persistent organic pollutants (POPs) by amending the EU POPs Regulation. On September 27, 2024, two key amendments were issued, focusing on hexabromocyclododecane (HBCDD) and methoxychlor.

The [first amendment, \(EU\) 2024/2555](#), tightens the restrictions on HBCDD, a flame retardant commonly used in electronics manufacturing. The allowed concentration threshold as an unintentional trace contaminant has been reduced from 100 mg/kg to 75 mg/kg in substances, mixtures, or flame-resistant products. However, a higher limit of 100 mg/kg remains in place for recycled polystyrene used in the production of EPS and XPS insulation materials for buildings and civil engineering works.

The [second amendment, \(EU\) 2024/2570](#), introduces methoxychlor to Part A of Annex I of the POPs Regulation. This addition covers all possible isomers of dimethoxydiphenyltrichloroethane and their combinations. Methoxychlor, primarily used as an insecticide in agriculture and home gardens, will be subject to strict controls. The regulation sets a concentration limit of 0.01 mg/kg (0.000001% by weight) for methoxychlor in substances, mixtures, or articles.

These amendments reflect the EU's ongoing commitment to reducing the environmental and health impacts of persistent organic pollutants. By lowering thresholds for HBCDD and introducing controls on methoxychlor, the Commission aims to minimize exposure to these substances across various industries and consumer products.

Companies operating in the EU market, particularly those in electronics manufacturing, construction, and agriculture, will need to adapt their processes to comply with these new regulations. The amendments are set to take effect on October 17, 2024, giving businesses a short window to prepare for the changes.

This regulatory update underscores the importance of staying informed about evolving chemical regulations and proactively managing compliance strategies to ensure continued access to the EU market.

As of October 14, 2024, the Compliance Data Exchange (CDX) EU POP Regulation regulation substances have been updated to include these new restrictions. You can read more about this release on our [website](#).

Universal PFAS: Update on PFAS Restriction Evaluation - September 2024 (update)

The European Chemicals Agency's (ECHA) Committees for Risk Assessment (RAC) and Socio-Economic Analysis (SEAC) made significant progress in their evaluation of the proposed restriction on per- and polyfluoroalkyl substances (PFAS) during their [September 26, 2024 meetings](#).

Key developments:

- The committees reached provisional conclusions on the proposed PFAS restrictions for the petroleum and mining sector.
- Discussions continued on PFAS use in textiles, upholstery, leather, apparel, carpets (TULAC), food contact materials, and packaging. These sectors will be further addressed in upcoming meetings.
- RAC agreed to revise the calculation method for PFAS emissions across different sectors, with a particular focus on the waste stage. This new approach emphasizes distinguishing between PFAS particle emissions and substances that leach from materials.
- The committees announced upcoming sectors for evaluation:
- November 2024: Construction products
- Future meetings: Applications of fluorinated gases, transport, and energy sectors

The summary of the current status of the scientific evaluation for the PFAS restriction proposal published by the European Chemicals Agency can be found [here](#).

REACH ANNEX XVII: EU REACH Amendment on PFHxA Restrictions (enforced)

Additionally, on September 20, 2024, the European Commission approved and published Amendment (EU) 2024/2462, adding [Entry 79 to EU REACH Annex XVII](#). This new restriction targets undecafluorohexanoic acid (PFHxA), its salts, and PFHxA-related substances.

The amendment has come into force on October 10, 2024, with restriction effective dates ranging from October 2026 to October 2029, depending on the product type. The regulation defines PFHxA-related substances as those having specific perfluoropentyl or perfluorohexyl groups, with certain exclusions.

Aspect	Details
Type of change	New entry (Entry 79) added to REACH Annex XVII
Substances covered	Undecafluorohexanoic acid (PFHxA), its salts and PFHxA-related substances

Main restrictions	Concentration limits: 25 ppb for PFHxA and salts; 1000 ppb for related substances
Key dates	From 10 April 2026: Restrictions on firefighting foams for training, testing, and public fire services (with exceptions) From 10 October 2026: Restrictions on textiles, leather, furs and hides in clothing and related accessories; footwear; paper and cardboard food contact materials; mixtures for the general public; and cosmetic products From 10 October 2027: Restrictions on other textiles, leather, furs and hides for the general public From 10 October 2029: Restrictions on firefighting foams for civil aviation

Table 1. Key points of the REACH Annex XVII update (Entry 79):

The regulation provides exemptions for certain personal protective equipment, medical devices, and construction textiles. Articles and mixtures placed on the market before the respective effective dates are also exempt.

As of September 30, 2024, the Compliance Data Exchange (CDX) REACH Annex XVII regulation substances have been updated to include this new restriction on PFHxA, its salts, and related substances. You can read more about this release on [our website](#).

This amendment aligns with global efforts to regulate per- and polyfluoroalkyl substances (PFAS), reflecting growing concerns about their environmental persistence and potential health impacts.

F-gases: EC Publishes Implementing Regulation for F-Gas Labelling (published)

The European Commission has published Commission Implementing [Regulation \(EU\) 2024/2174](#) on September 2, 2024, laying down rules for the labelling of containers and systems containing fluorinated greenhouse gases (F-gases) under the [F-Gas Regulation \(EU\) 2024/573](#).

The new regulation establishes detailed requirements for the format and design of labels for F-gas containers and systems. It mandates the inclusion of specific information on these labels, including:

- The weight of fluorinated greenhouse gases in kilograms/grams
- The CO₂ equivalent in tons
- Indication of reclaimed or recycled F-gases
- Specific use designations, such as "for military use only," "for destruction only," or "for MDI production only"

This implementing regulation complements the broader F-Gas Regulation (EU) 2024/573, which aims to reduce emissions of fluorinated greenhouse gases in the European Union. The labelling requirements are designed to enhance transparency and facilitate proper handling and disposal of F-gases.

Manufacturers, importers, and distributors of F-gases and related equipment will need to ensure compliance with these new labelling standards. The regulation is expected to improve traceability and management of F-gases throughout their lifecycle, contributing to the EU's climate objectives.

EU REACH SVHC Candidate List: Six New Substances Proposed (consultation)

The European Chemicals Agency (ECHA) has initiated a public consultation on a proposal to expand the Substances of Very High Concern (SVHC) Candidate List under the EU REACH

Regulation. The proposal seeks to add six new substances, potentially increasing the list to 247 entries. This consultation period, which runs from August 30 to October 14, 2024, provides an opportunity for stakeholders to submit comments and additional information regarding the proposed substances.

Currently, [the SVHC Candidate List contains 241 substances](#), though it's worth noting that some entries represent groups of chemicals, making the total number of affected chemicals higher. The inclusion of substances in this list triggers immediate obligations for companies using these materials above specified thresholds, including customer notification requirements and submissions to ECHA's SCIP Database.

The six proposed substances and their details are as follows:

Substance Name	EC Number	CAS Number	Reason for Proposing	Examples of use(s) in Electronics
6-[(C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid	701-118-1	2156592-54-8	Toxic for reproduction	Surface treatments and adhesion promotion in polymer-based components
O,O,O-triphenyl phosphorothioate	209-909-9	597-82-0	PBT	Flame retardant additive in polymeric materials
Octamethyltrisiloxane	203-497-4	107-51-7	vPvB	Silicone-based compound for coating and waterproofing
Perfluamine	206-420-2	338-83-0	vPvB	Fluorinated surfactant or solvent for cleaning or surface treatment
Reaction mass of: triphenylthiophosphate and tertiary butylated phenyl derivatives	421-820-9	192268-65-8	PBT	Antioxidant and flame retardant additive
Tris(4-nonylphenyl, branched and linear) phosphite	-	-	Endocrine disrupting properties	Stabilizer and antioxidant for polymers and materials

Industry stakeholders should take note of this development and consider reviewing their product portfolios and supply chains to assess potential impacts. The consultation period provides an important opportunity for companies to contribute information on the uses, volumes, exposure, alternatives, and risks associated with these substances.

For those seeking more information, ECHA's announcement of the proposals is available on their [official website](#).

RoHS: Key Changes and Implications (amendment)

The European Commission has recently unveiled an updated version of its "[RoHS 2 exemptions - Validity and rolling plan](#)" document, providing crucial insights into the current status of RoHS exemptions. This August 2024 release follows the expiration of several exemptions in July and the submission of new extension applications. Notable changes from the previous September 2023 version include:

1. Expiration of 50 additional exemptions, primarily affecting categories 9 (industrial), 8 (in vitro), and 11, with a July 21, 2024 expiration date
2. Validity extensions for specific exemptions:
 - Annex III, Exemption 39(a): Valid for all categories until November 21, 2025
 - Annex IV, Exemption 37: Valid for all categories until December 31, 2025
3. Introduction of new exemptions:
 - Annex III, Exemption 39(b): Valid for all categories until December 31, 2027
 - Annex III, Exemption 46: Valid for category 11 until May 28, 2028
4. Renewal requests submitted for:
 - Annex III, Exemption 24 (category 11)
 - Annex IV, Exemption 49 (category 9)

The document maintains the status quo for 114 exemptions with pending extension requests, including the critical Annex III exemption 6(a)-(c). A new "Last date of submission" column has been added, indicating the most recent receipt of renewal applications.

Industry stakeholders are advised to review this update carefully to ensure continued compliance with the RoHS Directive. The changes may have significant implications for product designs, supply chains, and market access strategies across various electronic and electrical equipment categories.

EU Battery Regulation: Upcoming Changes (release)

The [EU Battery Regulation \(2023/1542\)](#) is set to introduce important changes on August 18, 2024, marking a significant move towards enhancing battery sustainability and safety in the market.

1. From August 18, all portable batteries will need to meet new documentation standards. Manufacturers will be required to provide:
 - Comprehensive technical documentation
 - A Declaration of Conformity (DoC)
 - Proper CE marking

These steps are designed to improve traceability and ensure compliance throughout the supply chain.

2. To address environmental and health concerns, portable batteries must now contain no more than 0.01% lead by weight. This aligns with the EU's broader efforts to reduce hazardous substances in consumer products.
3. The regulation places greater responsibility on manufacturers, importers, and distributors. These economic operators must:
 - Verify CE markings before placing batteries on the market
 - Ensure overall compliance with the new standards
 - Maintain proper documentation for regulatory scrutiny
4. The regulation also sets or reinforces limits on several key substances:
 - Lead Compounds: 0.01% by weight limit in portable batteries
 - Mercury Compounds: 0.0005% by weight limit in all batteries
 - Cadmium Compounds: 0.002% by weight limit in portable batteries

These restrictions apply to batteries whether incorporated into appliances or not.

For those operating in the EU battery market, it's crucial to start preparing for these changes now. This could involve reviewing supply chains, updating product designs, and refining documentation processes. By taking proactive steps, businesses can ensure they remain compliant while contributing to the EU's sustainability goals.

CSRD: European Commission Releases FAQs (update)

On August 7, the European Commission [released a set of Frequently Asked Questions \(FAQs\)](#) to help companies understand the new EU Corporate Sustainability Reporting Directive (CSRD). This guidance comes as businesses prepare for their first reporting cycle under these rules, which will begin in 2025 for the 2024 financial year.

The FAQs cover a range of topics, including when companies can use estimates instead of collecting detailed data from suppliers or partners. This clarification is particularly helpful for businesses that may struggle with gathering all the necessary information.

Key points in the FAQs include:

- An overview of the new sustainability reporting requirements
- Information on how to assure sustainability reports
- Guidance on reporting key intangible resources
- Requirements for companies based outside the EU
- How these rules interact with the Sustainable Finance Disclosure Regulation (SFDR)

To assist companies in figuring out their reporting obligations, the FAQs also include a flowchart. This tool helps businesses determine if they need to report and for which financial year.

The Commission aims to support companies while reducing administrative burdens. As businesses get ready for these new requirements, this FAQ document will be a valuable resource for ensuring compliance and improving the quality of sustainability reports. The Commission has indicated that it may update these FAQs as needed, showing its commitment to helping companies navigate this transition.

POPs: Regulatory Update on Dechlorane Plus (consultation)

On June 26, 2024, the European Commission launched a [public consultation](#) on a proposed delegated regulation to amend Regulation (EU) 2019/1021 on persistent organic pollutants (POPs). This amendment aims to include Dechlorane Plus (DP) in Part A of Annex I of the POPs Regulation, effective February 26, 2025.

Key points of the proposed regulation:

- Dechlorane Plus, including its syn- and anti-isomers, will be added to the list of restricted substances.
- A maximum unintentional trace contaminant (UTC) value of 1 mg/kg (0.0001%) is set for DP in substances, mixtures, and articles.
- Time-limited derogations are proposed for specific industries:
 - o Medical devices and aerospace sectors: 5-year derogation, with the possibility of an additional 5-year extension
 - o Spare parts for various industry sectors: derogation until 2043

- Notably, the Non-Road Mobile Machine sector does not have a listed derogation.

Stakeholders had until July 24, 2024, to submit their feedback through the official European Commission website. This consultation was a crucial opportunity for interested parties to express their views on the proposed regulatory changes, which included various derogations for specific industries.

The consultation process was designed to ensure that all relevant voices were heard before finalizing the amendments to the regulation, reinforcing the EU's commitment to addressing environmental and health concerns associated with persistent organic pollutants.

Marine Equipment Directive Update (EU) 2024/1975 (published)

The European Commission has published [Implementing Regulation \(EU\) 2024/1975](#), updating the rules for marine equipment in the European Union. This new regulation, adopted on July 19, 2024, will come into force on September 4, 2024, and amends the existing Marine Equipment Directive.

The regulation outlines new design, construction, performance requirements, and testing standards for marine equipment as specified in international instruments referenced in Directive 2014/90/EU. These updated standards aim to enhance marine safety and reduce pollution risks.

The regulation includes an annex listing various categories of marine equipment subject to the updated standards, including:

- Life-saving appliances
- Marine pollution prevention equipment
- Fire protection equipment
- Navigation equipment
- Radio-communication equipment
- Equipment required under COLREG 72
- Other safety equipment
- Equipment under SOLAS Chapter II-1
- Equipment not subject to MED certification

To allow the marine equipment industry time to adapt, the regulation provides transition periods:

- Equipment listed under Implementing Regulation (EU) 2021/1158 can be used until August 25, 2024
- Equipment listed under Implementing Regulation (EU) 2022/1157 can be used until August 15, 2025
- New equipment listed under this regulation (2024/1975) can be used until September 4, 2027, if it conforms to national requirements before September 4, 2024

The regulation will be directly applicable and binding in all EU Member States. It aims to streamline regulations by replacing outdated frameworks with a single, updated system. Manufacturers and suppliers will need to adapt to new requirements, potentially affecting product design, testing, and certification processes. This update to the Marine Equipment Directive represents a step in ensuring that marine equipment complies with the latest safety and performance standards.

EU REACH Annex XVII: Two New Substances Proposed for Restriction

The European Commission has [submitted a draft amendment to expand the Restricted Substance List under Annex XVII](#) of EU REACH. This proposal, put forward on July 30, 2024, aims to enhance chemical safety regulations within the European Union by adding two new substances to the list.

The substances under consideration are:

Substance	CAS Number	EC Number	Common Use in Electronics
Dimethylacetamide (DMAC)	127-19-5	204-826-4	Solvent for polyimide films, coatings, and adhesives; cleaning and processing semiconductor materials
1-ethyl-2-pyrrolidinone (NEP)	2687-91-4	220-250-6	High-performance solvent for resins, coatings, and photoresists in semiconductor manufacturing and other electronic applications

The European Commission has outlined a timeline for the implementation of these new restrictions. The draft amendment is expected to be adopted in the first quarter of 2025, with the restrictions coming into force 20 days after publication in the Official Journal of the EU. To allow industry sufficient time for compliance, the application of the restrictions will be deferred for 18 months after entry into force. An extended period of 48 months after entry into force has been proposed for the DMAC man-made fibres sector, recognizing the specific challenges this sector may face in adapting to the new regulations.

This proposal signifies the ongoing efforts of the European Commission to refine and strengthen chemical regulations within the EU. Currently, there are 77 valid entries on REACH Annex XVII (updated 2023), each detailing the substance or group of substances and the consequent restriction conditions.

Companies operating in or exporting to the EU should take note of these potential changes and begin assessing their product portfolios and supply chains for potential impacts. We suggest utilizing the "Where Used" analysis tool in CDX to determine whether these two substances are already present in products. Early preparation will be key to ensuring smooth compliance with these new restrictions once they come into effect.

The Ecodesign for Sustainable Products Regulation (ESPR) (published)

The European Commission has published the [Ecodesign for Sustainable Products Regulation \(ESPR\) \(EU\) 2024/1781](#), which entered into force on July 18, 2024. This new regulation significantly expands the scope of the previous Ecodesign Directive, covering a wide range of physical products placed on the EU market.

The ESPR introduces comprehensive ecodesign requirements focusing on sustainability, including durability, reusability, upgradability, reparability, resource efficiency, and recycled content. A Digital Product Passport (DPP) will be required for regulated products, providing easy access to sustainability information.

The regulation introduces comprehensive information requirements for Substances of Concern (SoC), which encompass a broader range of materials:

- Substances identified as Substances of Very High Concern (SVHC) according to Article 57 and Article 59(1) of Regulation (EC) No 1907/2006
- Substances with harmonized classification under specific hazard classes or categories as per the CLP Regulation (EC) No 1272/2008
- Substances regulated under Persistent Organic Pollutants (POPs) legislation, specifically Regulation (EU) 2019/1021
- Substances that negatively impact the reuse and recycling of materials in products

Implementation Timeline:

- July 18, 2024: ESPR entered into force
- April 19, 2025: Deadline for adoption of the first working plan prioritizing product groups for upcoming regulations
- 2027-2028: First set of ecodesign requirements expected to be implemented

Companies should begin preparing for data collection along their supply chains, particularly regarding substances of concern, in anticipation of these new requirements. The regulation grants an 18-month transition period after each product-specific regulation comes into force.

The ESPR represents a significant step towards the EU's circular economy objectives and will have far-reaching implications for manufacturers, importers, and distributors operating in the EU market.

The FAQ document on the new Ecodesign for Sustainable Products Regulation - (EU) 2024/1781 can be found [here](#).

The "Right to Repair" Directive (EU) 2024/1799 (published)

The European Parliament and Council have published [Directive \(EU\) 2024/1799](#) on common rules promoting the repair of goods, also known as the "Right to Repair" Directive. This new legislation entered into force on July 10, 2024, and aims to extend the lifespan of consumer products by facilitating repairs.

The directive introduces a new obligation for manufacturers to repair products at the consumer's request, even outside the warranty period. This applies to goods subject to EU repairability requirements, including domestic appliances, smartphones, and tablets. While repairs need not be free, prices must be reasonable.

Warranty Period Extension: To incentivize repairs during the warranty period, the directive extends the legal guarantee by 12 months when a product is repaired rather than replaced.

Information Requirements: Manufacturers must inform consumers about their repair obligations and typical repair costs. A standardized European Repair Information Form will be introduced to provide consumers with transparent repair conditions and cost estimates.

Repair Choice: Consumers retain the right to choose their repair service provider. Manufacturers are prohibited from using technology that prevents third-party repairs and must provide necessary repair information to third parties.

Implementation Timeline:

- July 10, 2024: Directive entered into force

- July 31, 2026: Deadline for Member States to transpose the directive into national law
- July 31, 2027: European Commission to establish an online repair platform

The directive primarily impacts manufacturers, but also addresses authorized representatives, importers, and distributors. For manufacturers outside the EU, the repair obligation may fall to their EU representatives or importers.

Great Britain

Environment Agency Issues New Guidance on EEE and WEEE Classification (release)

The [Environment Agency for England has released new guidance](#) on the classification and management of electrical and electronic equipment (EEE) at the end of its lifecycle. This guidance provides clarity on when EEE becomes waste electrical and electronic equipment (WEEE) and outlines proper management procedures.

Key aspects of the guidance include:

1. Six conditions (A-F) that must be met for EEE transferred to a third party for reuse to maintain its EEE status
2. Specific preparation procedures required for WEEE to potentially regain EEE status, including:
 - Visual inspection
 - Assessment for persistent organic pollutants (POPs)
 - Electrical safety testing
 - Functionality testing
3. Requirements for proper packaging and handling instructions to maintain item integrity during transport

The guidance applies to various stakeholders in the EEE/WEEE sector, including approved treatment facilities, collection facilities, producer compliance schemes, and organizations involved in EEE reuse or disposal. Implications for businesses include the need to:

- Assess items against provided criteria for accurate classification
- Apply appropriate waste controls and classification codes to WEEE
- Evaluate WEEE for hazardous substances
- Maintain comprehensive records of testing and preparation procedures

This guidance is crucial for ensuring compliance with UK waste regulations and promoting proper management of electronic waste streams. Stakeholders are advised to review the guidance thoroughly to ensure their practices align with these new regulatory expectations.

If you would like to learn more or discuss how our solutions can help your business grow, please contact the CDX Team at: cdx-info@dx.com.

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