



Dear CDX User,

At CDX, we are more than just a software solution - we are your dedicated partners in navigating the complex regulatory landscape. We understand that staying up to date with evolving regulations can be a difficult challenge, which is why we work hard to provide exceptional support for our customers.

Our commitment to your success goes well beyond system enhancements. We regularly host informative webinars with participation from industry experts, create comprehensive whitepapers and factsheets, and deliver timely regulatory updates to ensure you stay informed and prepared. Our goal is to equip you with the knowledge and tools necessary to confidently address any regulatory challenges that may arise.

As active members of organizations such as IAEG, AEM, AIAG, and IPC, we ensure that CDX remains at the forefront of industry requirements. Recently, we have updated the following lists:

- the Rail Industry Substance List (RISL),
- the IEC 62474 Declarable Substance List (DSL),
- the Aerospace and Defense Declarable Substance List (AD-DSL),
- the Heavy Equipment Declarable Substance List (HEDSL).

You can read about this news under [the News on our webpage](#).

Furthermore, in our commitment to providing documentation that reflects the most current regulatory scope, we have updated the TSCA Section 8(a)(7) Reporting and Recordkeeping whitepaper. This revision addresses the EPA's interim final rule, which extends the data submission deadline for most manufacturers to October 13, 2026.

As we wrap up Q2 2025, we hope these updates help you stay ahead of the latest regulatory changes. Your feedback is invaluable as we strive to provide the best support, so please share any thoughts or questions with us at cdx-info@dx.com.

Agenda

Unites State, Federal level	3
<i>PFAS TSCA 8(a)(7): EPA Proposes to Delay TSCA PFAS Reporting Deadlines</i>	3
<i>PFAS: EPA Announces New Strategy to Tackle PFAS</i>	3
<i>TSCA: EPA Delays Compliance Date for Certain TCE Rule Provisions</i>	3
<i>TSCA: EPA Extends Deadline for TSCA Health and Safety Data Reporting to 2026</i>	4
<i>CMRT: RMI Releases Updated Conflict Minerals Reporting Template (CMRT 6.5)</i>	4
United States, States level	5
<i>PFAS: States Lead the Charge - The Growing Push for PFAS Laws</i>	5
United States, Minnesota	5
<i>PFAS: Minnesota Sets New Rules for PFAS Reporting and Fees</i>	5
United States, North Carolina	6
<i>PFAS: Bill Proposes Broad Ban on PFAS in Products and Packaging</i>	6
United States, New Mexico	6
<i>PFAS: New Mexico Sets Broad PFAS Ban and Reporting Rules</i>	6
United States, Maine	7
<i>PFAS: Maine's PFAS Exemption Deadline Has Passed</i>	7
Canada	7
<i>PFAS: Canada Moves Ahead with Plan to Regulate PFAS</i>	7
European Union	8
<i>EU Green Claims: Future of EU Green Claims Directive Uncertain After Negotiations Halted</i> ..	8
<i>Battery Regulation: RMI Expands EMRT to Include Nickel, Lithium, and Other Key Minerals</i> ...	9
<i>Battery Regulation: EU to Postpone Due Diligence Obligations</i>	9
<i>Battery Regulation: Battery Removability Exemption Deadline Has Passed</i>	10
<i>Battery Regulation: Future Performance and Durability Standards for Industrial Batteries</i>	10
<i>Omnibus: EU Proposes a Shift to Digital-Only Product Documents</i>	10
<i>REACH: EU Adds Two Solvents to REACH Restricted Substances List</i>	10
<i>REACH: ECHA Adds Three New Substances to REACH SVHC List</i>	11
<i>REACH: ECHA Proposes EU-Wide Ban on Thirteen Chromium (VI) Substances</i>	11
<i>REACH: Wording Corrected in Synthetic Polymer Microparticle Restriction</i>	12
<i>PFAS: ECHA Committees Reach Conclusions on First Sectors</i>	12
<i>Deforestation Regulation: EU Proposes Technical Clarifications to EUDR</i>	12
<i>ELV: EU Proposes Landmark Circularity Rules for the Automotive Sector</i>	13
<i>PoP: EU Adopts Stricter Limits for PFOS</i>	14
Switzerland	14
<i>REACH: Switzerland Proposes Major Update to Chemical Regulations to Align with EU</i>	14

Unites State, Federal level

PFAS TSCA 8(a)(7): EPA Proposes to Delay TSCA PFAS Reporting Deadlines

The [U.S. Environmental Protection Agency \(EPA\) has announced](#) a proposal to postpone the reporting window for its TSCA Section 8(a)(7) PFAS Rule. The agency is making this change to give them more time to finalize the electronic application for data collection.

For businesses worldwide that manufacture or import products into the U.S., this proposed extension is a valuable opportunity to get ahead of these complex reporting requirements. You can use this extra time with the CDX platform to collect PFAS data throughout your supply chain, analyze Material Data Sheets (MDS) to identify in-scope substances, and manage supplier declarations to build a strong compliance foundation.

Under the proposed rule, the reporting deadlines will be adjusted as follows:

- The general submission period, originally set to begin on July 11, 2025, will now run from April 13, 2026, to October 13, 2026,
- Small manufacturers who only need to report on PFAS in imported articles will have a later deadline of April 13, 2027.

The public comment period for this proposal closed on June 12, 2025, and the rule is now pending finalization.

PFAS: EPA Announces New Strategy to Tackle PFAS

The [U.S. Environmental Protection Agency \(EPA\) has announced](#) a new strategy for regulating Per- and Polyfluoroalkyl Substances (PFAS) that makes accountability a top priority. Administrator Lee Zeldin outlined several new actions that will directly affect how businesses handle these "forever chemicals."

For companies, the biggest change is the EPA's commitment to a **"polluter pays" model**. This approach aims to make PFAS producers and users financially responsible for cleanup, protecting entities like local water utilities from inheriting the costs. Businesses involved in the PFAS supply chain could face major new costs and legal duties.

Businesses should also prepare stricter rules on their operations and reporting requirements. The EPA plans to develop new **effluent limitations guidelines (ELGs)** for PFAS manufacturers and metal finishers, creating stricter rules for discharging these substances. Additionally, more PFAS will be added to the **Toxic Release Inventory (TRI)**, which will expand reporting duties for many facilities.

Overall, these actions show the EPA is getting much tougher on PFAS. This is a clear signal for businesses to prepare now for tighter regulations and greater enforcement ahead.

TSCA: EPA Delays Compliance Date for Certain TCE Rule Provisions

The [U.S. Environmental Protection Agency \(EPA\) has once again postponed the effective date](#) for certain provisions of its final rule on trichloroethylene (TCE) under the Toxic Substances Control

Act (TSCA). This delay specifically affects the conditions imposed on businesses operating with TSCA Section 6(g) exemptions.

The compliance date for these specific conditions, previously set for June 20, 2025, has been pushed back an additional 60 days to August 19, 2025. The EPA has stated this extension is to ensure its administrative timeline aligns with ongoing court proceedings, as the agency intends to reconsider parts of the final rule.

For most companies, the larger rule, which bans the majority of TCE uses within one year, is not affected by this specific postponement. However, this delay is significant for businesses in critical sectors like defense and aerospace that rely on TSCA exemptions to continue using TCE. It gives these specific companies more time to prepare for the stringent workplace safety conditions required by the rule.

TSCA: EPA Extends Deadline for TSCA Health and Safety Data Reporting to 2026

The U.S. Environmental Protection Agency (EPA) has extended the deadline to May 22, 2026, for its Health and Safety Data Reporting rule. This rule applies to businesses that have manufactured or imported any of 16 specific chemical substances in the last 10 years, including as an impurity. Affected companies, particularly in sectors like chemical manufacturing and petroleum refining, are required to submit unpublished health and safety studies to the EPA. These studies cover health and environmental effects, exposure data, and physical-chemical properties and must be submitted electronically through the **EPA's Central Data Exchange (CDX) system**.

The EPA is collecting this information to inform its work under the Toxic Substances Control Act (TSCA), such as prioritizing chemicals and evaluating their risks. The agency pushed back the previous deadlines to give itself more time to finalize guidance for companies on how to submit their data. This reporting rule officially took effect on June 9, 2025.

The **Compliance Data eXchange (CDX) platform** helps businesses manage these new reporting duties. Companies can use CDX to create their own internal regulations based on these 16 substances, making it easier to collect information from the supply chain. The platform can also analyze existing Material Data Sheets (MDS) to identify if they include any of the listed chemicals, allowing businesses to handle their regulatory maintenance independently.

The complete text of the rule, which applies to the 16 chemicals, including vinyl chloride, benzene, and bisphenol A (BPA) can be found [here](#).

CMRT: RMI Releases Updated Conflict Minerals Reporting Template (CMRT 6.5)

The Responsible Minerals Initiative (RMI) released [version 6.5 of the Conflict Minerals Reporting Template \(CMRT\)](#) on April 25, 2025. This updated version was also introduced into the CDX platform to support businesses with their current reporting requirements.

For businesses, using the new CMRT 6.5 is a key part of meeting regulatory rules. The template helps meet SEC reporting rules under the Dodd-Frank Act and uses more accurate smelter data which creates greater transparency in the supply chain.

The template standardizes how data for tin, tantalum, tungsten, and gold is collected. This gives businesses better control over supply chain risks and helps ensure their sourcing is ethical.

Since CMRT 6.5 is fully integrated within the CDX platform, organizations can efficiently collect and manage conflict minerals data across their entire supply chains. CDX provides the tools to communicate with suppliers and simplify reporting, making it easier to keep up with these requirements.

United States, States level

PFAS: States Lead the Charge - The Growing Push for PFAS Laws

Regulating PFAS in products is no longer something only a few states are doing; it is now happening across the country. In 2025 alone, the push to get rid of these "forever chemicals" from consumer goods has been huge, [with at least 37 states introducing over 200 different bills](#).

This wave of new laws shows a clear trend of states taking action. For example, early this year, California and New York both put new restrictions on PFAS in clothing, which is a big change for that industry.

The reach of these new rules is broad and getting bigger. Beyond clothing, state lawmakers are also targeting PFAS in other product categories, including:

- Children's products
- Outdoor gear
- Cosmetics

A key detail for manufacturers is the definition of "intentionally added PFAS." As of January 1, 2025, some states, like Colorado and California, set the limit at 100 parts per million (ppm). However, the rules are expected to get even stricter, with plans to lower this limit to 50 ppm by 2027, making it harder for businesses everywhere to keep up.

United States, Minnesota

PFAS: Minnesota Sets New Rules for PFAS Reporting and Fees

Minnesota has new rules [Chapter 7026](#) for products with intentionally added PFAS that clarify definitions, reporting, and fees. In Minnesota, **PFAS are defined as a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom**. The rules also set a high standard for how companies must investigate their own supply chains.

Under the new rule, manufacturers selling these products in Minnesota must report them by **January 1, 2026**. All intentionally added PFAS must be reported no matter the concentration, so even trace amounts count. If a company doesn't know the exact amount of a specific PFAS, it must measure the product's total organic fluorine instead.

Businesses are now required to thoroughly check their products and supply chains for these substances. They must keep detailed records of their supplier communications and be ready to show them to the MPCA if asked. Products can only be reported as a group if they are nearly identical in their PFAS content, which prevents broad generalizations.

With these strict rules, businesses need to be able to track materials through their supply chains now to meet the 2026 deadline. The CDX platform gives businesses the tools to gather and organize this detailed PFAS data from their suppliers, making it simpler to find these substances and handle the new reporting.

United States, North Carolina

PFAS: Bill Proposes Broad Ban on PFAS in Products and Packaging

A [new bill in North Carolina \(H.R. 882\)](#) aims to ban intentionally added PFAS in all products and packaging sold in the state. This includes everything from food packaging to components used to make other products. The ban would apply to any PFAS added for a specific function or used during manufacturing, such as processing agents or mold release agents. If the bill passes, making or selling products with these PFAS would be illegal. The rule wouldn't cover the sale or resale of used products.

The biggest change for businesses is the need for a signed certificate of compliance to prove their products are PFAS-free. This puts responsibility squarely on the manufacturer. Instead of just reacting to supplier information, companies now must dig deep into their own supply chains to be sure they are compliant. This means getting confirmation from every supplier, no matter how small, and knowing how every part is made.

The law is set to take effect on **October 1, 2025**, while funding the state's environmental agency to enforce **July 1, 2025**.

United States, New Mexico

PFAS: New Mexico Sets Broad PFAS Ban and Reporting Rules

On April 8, 2025, New Mexico passed a major new law ([HB 212 Chapter 102](#)) that sets wide-ranging rules for products with intentionally added PFAS. The law phases in a ban on certain product categories over several years and creates new reporting requirements for manufacturers.

The sale of products with intentionally added PFAS will be banned in stages:

- Starting **January 1, 2027**, the ban will cover cookware, food packaging, dental floss, firefighting foam, and juvenile products.
- Starting **January 1, 2028**, it will expand to include carpets, cleaning supplies, cosmetics, and textiles.
- By **January 1, 2032**, most other products containing intentionally added PFAS will be banned, unless they qualify for a specific exemption.

However, a crucial part of this law is how it defines PFAS. Unlike similar laws in states like Maine and Minnesota, New Mexico's rule is the first to exempt certain solid fluoropolymers, such as PTFE. This is a significant distinction that will have a major impact on many industries that rely on these materials for critical applications.

In addition to the bans, manufacturers must report any products with intentionally added PFAS to the state by **January 1, 2027**. This requires businesses to gather detailed information from their entire supply chain. The CDX platform gives companies the tools to handle this by allowing them to contact suppliers directly, analyze Material Data Sheets (MDS) to check for these PFAS, and collect the necessary supplier declarations to prepare their reports.

The law also exempts other products, like medical devices and cars. State agencies will now write the detailed rules for enforcement, so businesses should keep an eye on that process.

United States, Maine

PFAS: Maine's PFAS Exemption Deadline Has Passed

For manufacturers selling products in Maine, a critical regulatory deadline has now passed. **June 1, 2025**, was the final day for companies to apply for a "currently unavoidable use" (CUU) designation for products containing intentionally added per- and polyfluoroalkyl substances (PFAS).

This application was the only pathway to seek an exemption from the state's comprehensive ban on PFAS in products, which is set to take full effect on January 1, 2026.

To be granted a CUU exemption, manufacturers were required to provide robust evidence demonstrating that:

- The use of PFAS is essential for the product to function as intended.
- There are no safer or technically feasible alternatives available on the market.

Companies that missed the June 1 deadline or have their CUU applications denied will be legally required to cease selling any products containing intentionally added PFAS in Maine by the 2026 effective date. This underscores the state's firm commitment to phasing out these chemicals from consumer goods and requires immediate attention from any affected businesses to ensure compliance.

Canada

PFAS: Canada Moves Ahead with Plan to Regulate PFAS

The Canadian government is taking the next step in its plan to regulate PFAS now that the [public comment](#) period for its proposed rules closed on **May 7, 2025**. This confirms the government will regulate most PFAS as a single toxic class, with the first new rules expected as early as 2027.

The plan is broken down into three phases to address different product types based on their complexity:

- **Phase 1: Firefighting Foams**
The first rules will target firefighting foams that contain PFAS, which have long been known as a major source of environmental contamination.

- **Phase 2: Consumer Products**

The next phase will ban PFAS in everyday consumer goods. This will affect products like cosmetics, textiles, and food packaging.

- **Phase 3: Industrial and Transport Uses**

The final phase will deal with more complex industrial uses in sectors like automotive, aerospace and defense, and electronics, where finding substitutes is harder. Importantly for industry, the government has said that fluoropolymers - a key type of PFAS needed for many high-performance products - are not part of this plan and will be looked at separately.

It is important to note that the current proposal excludes fluoropolymers, which will be assessed separately due to having a different hazard profile. This is a critical detail for many industrial applications, as fluoropolymers are a significant subgroup of PFAS used in almost all sectors.

While there isn't an immediate ban on PFAS, the Canadian government's long-term strategy clearly signals that industrial and transport uses will face restrictions in the future. Companies are encouraged to begin understanding their use of PFAS and exploring alternatives in preparation for upcoming regulations.

European Union

EU Green Claims: Future of EU Green Claims Directive Uncertain After Negotiations Halted

The future of the European Union's plan to stop misleading environmental claims is now uncertain. After making good progress in April, the final negotiation for the new Green Claims Directive was suddenly cancelled in June, leaving businesses across the world wondering what will come next.

On **April 24, 2025**, EU negotiators met to discuss the details of the new directive. The goal was to make sure that when a company claims its product is "biodegradable" or "less polluting," it can prove it.

The main proposals on the table included:

- Companies would need to have their environmental claims verified by an independent expert before using them.
- A simpler, faster verification process would be available for common claims to make things easier for businesses.
- Companies caught greenwashing could face big fines and be banned from public contracts.

Why the Talks Halted?

Shortly before the final meeting on **June 23, 2025**, the European Commission unexpectedly announced that it was considering the complete withdrawal of the proposal. This came after worrying that the new rules would be too complex and costly for small and medium-sized businesses. This happened after concerns were raised that the new rules might be too overwhelming for small and medium-sized businesses to follow. While the Green Claims Directive isn't officially withdrawn, it is on hold for now, and its future is unclear.

However, businesses must understand that the EU's fight against greenwashing is continuing. A separate law, the Empowering Consumers for the Green Transition Directive, has already

been passed and will take effect on **September 27, 2026**. This law protects shoppers from misleading advertising. It will ban the use of unclear, general terms like "eco-friendly" or "green" unless the product has earned a recognized sustainability label or certification.

This leaves businesses in a confusing and uncertain position. Although the EU now bans unclear green claims, the detailed "rulebook" that was supposed to explain how to comply is now missing.

Without one clear set of standards for the entire EU, each country could interpret the law differently. This creates a significant risk for companies, especially those with international marketing campaigns. A claim that is acceptable in one country could be challenged in court in another, leaving the final decision up to national authorities.

Battery Regulation: RMI Expands EMRT to Include Nickel, Lithium, and Other Key Minerals

The Responsible Minerals Initiative (RMI) released the [latest version of the Extended Minerals Reporting Template \(EMRT\)](#) on April 25, 2025, adding several new and important minerals to its scope.

The template now includes graphite, nickel, and lithium to help companies meet the EU Battery Regulation, as well as copper, because of its complex supply chain. These minerals are essential for clean energy technology, electric vehicles, and electronics, and customers are increasingly demanding that they be sourced responsibly.

CDX Extended Minerals substance group has been updated to help businesses screen Material Data Sheets (MDS) for these newly added substances. This allows companies to focus their data collection on the right suppliers and develop a smart strategy to comply with the new rules.

Battery Regulation: EU to Postpone Due Diligence Obligations

The European Union institutions are advancing a legislative [proposal to postpone the implementation of supply chain due diligence obligations](#) under the EU Batteries Regulation. The proposal, part of the wider "Omnibus IV" package introduced on May 21, 2025, would defer the compliance deadline by two years, from **August 18, 2025, to August 18, 2027**.

This postponement is intended to provide the industry with additional time to prepare for the regulation's extensive requirements. These obligations mandate that economic operators identify, prevent, and address social and environmental risks within their supply chains for raw materials such as cobalt, lithium, nickel, and natural graphite.

On **June 19, 2025**, the Council of the EU formally adopted its position in support of the postponement, a critical step that enables accelerated negotiations with the European Parliament. EU co-legislators are treating the measure with urgency to provide legal certainty for affected businesses as the original deadline neared.

While the postponement offers a revised implementation timeline, the substantive due diligence requirements remain unchanged. Companies in the battery value chain are advised to use this additional period to establish robust traceability and risk management systems that will be necessary to demonstrate compliance by the new 2027 deadline.

Battery Regulation: Battery Removability Exemption Deadline Has Passed

For manufacturers of products containing portable batteries, a deadline under the new EU Batteries Regulation has now passed. **April 30, 2025**, was the final day for businesses to apply for an exemption from the EU's upcoming rules on battery removability.

These new rules are a key part of the EU's sustainability goals, requiring that end-users can easily remove and replace portable batteries. The exemption process was intended for specific cases where this was not feasible due to product safety or design constraints.

Organizations that did not submit an application by the deadline, or whose requests are not approved, will need to ensure their products are fully compliant with the removability requirements as they come into force.

Battery Regulation: Future Performance and Durability Standards for Industrial Batteries

The European Commission has released a new [technical report from its Joint Research Centre \(JRC\)](#) that outlines the future of quality standards for industrial batteries. This document provides recommendations for the upcoming mandatory **performance and durability requirements** that will apply to rechargeable industrial batteries with a capacity greater than 2 kWh, as required by the EU Batteries Regulation.

Omnibus: EU Proposes a Shift to Digital-Only Product Documents

On May 21, 2025, the European Commission proposed a major new plan called "Omnibus IV" to simplify and modernize EU regulations. The biggest part of this plan is a push to **digitize product information**, which would allow companies to provide key compliance documents electronically instead of on paper. The goal is to cut costs and paperwork for businesses and make product information easier to access across the EU. If the plan becomes law, it will change several existing EU rules, including the RoHS Directive, to bring in a digital first approach. The key changes are:

- For non-safety information, companies could provide key documents like the **Declaration of Conformity (DoC)** and **user instructions** in digital format only.
- For products that will need a **Digital Product Passport (DPP)**, these new digital documents would have to be accessible through it, creating a single source for all product information.
- The plan also aims to standardize product specifications, which would simplify the complex rules manufacturers face today.

This proposal will have a broad impact on sectors governed by harmonized EU rules. Industries that would be significantly affected include: Machinery, Batteries, Electrical and electronic equipment (under the RoHS Directive) and Radio equipment.

The **Omnibus IV proposal is not yet law**. It must now go through the EU's ordinary legislative procedure, which requires review and approval from both the European Parliament and the Council. We will continue to monitor the negotiations and provide updates as this important legislative package moves forward.

REACH: EU Adds Two Solvents to REACH Restricted Substances List

On June 3, 2025, the European Commission updated the EU REACH Annex XVII Restricted Substances List, [adding two new entries](#): N,N-dimethylacetamide (DMAC) and 1-ethylpyrrolidin-2-

one (NEP). Both solvents, used in products like synthetic fibers and coatings, have been restricted because they are classified as toxic to reproduction.

The new rules introduce the following restrictions:

- **Entry 80: N,N-dimethylacetamide (DMAC)**
 - o **Restriction:** Cannot be placed on the market or used in concentrations of 0.3% or greater.
 - o **Effective Date:** December 23, 2026, with an extension to June 23, 2029, for its use as a solvent in man-made fiber production.
- **Entry 81: 1-ethylpyrrolidin-2-one (NEP)**
 - o **Restriction:** Cannot be placed on the market or used in concentrations of 0.3% or greater.
 - o **Effective Date:** December 23, 2026.

We advise all users to review their chemical inventories in CDX and product data to ensure their declarations are accurate and that they can meet these upcoming deadlines.

REACH: ECHA Adds Three New Substances to REACH SVHC List

On June 25, 2025, the European Chemicals Agency (ECHA) [officially added three new Substances of Very High Concern \(SVHCs\)](#) list. This update creates immediate new duties for companies that make, import, or sell products in the EU. The newly added substances, which are now active in the CDX substance list, are:

- **Reactive Brown 51**, a colorant used in textiles that is classified as toxic for reproduction.
- **Decamethyltetrasiloxane**, a siloxane used in specialty fluids and coatings that is classified as very persistent and very bioaccumulative (vPvB).
- **1,1,1,3,5,5,5-heptamethyl-3-[(trimethylsilyl)oxy]trisiloxane**, another siloxane used to produce silicone polymers, also classified as vPvB.

This update triggers immediate legal obligations under REACH. Businesses are now required to inform their customers if any product contains these substances above a 0.1% concentration and must submit a SCIP database notification for any affected articles.

REACH: ECHA Proposes EU-Wide Ban on Thirteen Chromium (VI) Substances

The European Chemicals Agency (ECHA) [has proposed a new restriction](#) that would effectively ban certain chromium (VI) substances across the European Union. These substances, which are currently managed through the REACH authorization process, have been identified by ECHA as among the most potent workplace carcinogens, posing a serious risk to worker health.

In its official report, ECHA concluded that an EU-wide restriction is necessary. The proposal would ban the use of these chromium (VI) substances, either on their own or in mixtures, at a concentration equal to or greater than 0.01% by weight. The plan includes exemptions for certain uses when they meet defined limits for worker exposure and environmental emissions. All stakeholders have the opportunity to provide information backed by robust evidence during a six-month consultation, which is expected to start on 18 June 2025.

With this proposal now public, the immediate next step for businesses is to identify where chromium (VI) substances are used across their product lines. Conducting a "Where-Used" analysis is an effective way to gather this data, which provides the necessary foundation for assessing the full impact of the proposed restrictions on a company's portfolio and supply chain.

REACH: Wording Corrected in Synthetic Polymer Microparticle Restriction

On June 6, 2025, the [European Commission published a corrigendum](#) to the REACH Annex XVII restriction on synthetic polymer microparticles (Regulation (EU) 2023/2055). This is a technical clarification to ensure legal precision and does not alter the scope or the practical obligations of the restriction itself.

PFAS: ECHA Committees Reach Conclusions on First Sectors

The European Chemicals Agency's (ECHA) scientific committees made progress on the EU-wide proposal to restrict per- and polyfluoroalkyl substances (PFAS) during their [June 2025 meetings](#).

The Committee for Risk Assessment (RAC) and the Committee for Socio-Economic Analysis (SEAC) continued their detailed evaluation of the proposal, reaching provisional conclusions for several key sectors:

- Both committees reached provisional conclusions regarding the use of PFAS in medical devices.
- RAC also reached provisional conclusions for lubricants.
- SEAC reached provisional conclusions for the transport sector.

The committees also announced a tentative plan for which sectors will be evaluated next. The upcoming schedule includes:

- **September 2025:** Topics will include electronics, semiconductors, PFAS manufacturing, and general considerations such as enforceability and concentration limits. SEAC will also continue its work on energy and lubricants.
- **Post-September 2025:** Continued evaluation of electronics, semiconductors and PFAS manufacturing.

Deforestation Regulation: EU Proposes Technical Clarifications to EUDR

Regulation (EU) 2023/1115 lays down rules aiming to minimize the Union's contribution to deforestation and forest degradation. It does so by imposing due diligence obligations on operators and traders placing on, making available on, or exporting from the Union market relevant commodities and products listed in Annex I to that Regulation.

On April 15, 2025, the European Commission released a proposed [Delegated Regulation to amend Annex I](#) of the EU Deforestation Regulation (EUDR). The amendment introduces targeted technical clarifications designed to ensure legal certainty for operators and competent authorities and to prevent unnecessary compliance burdens.

The key revisions proposed in the draft are as follows:

- For broad categories like Palm Oil and Rubber, the proposal adds the "ex" prefix to certain product codes. This clarifies that the EUDR applies only when a product is manufactured

using a relevant commodity, preventing the regulation from unintentionally covering goods made from other materials.

- The text explicitly excludes waste, second-hand goods, and used products from the regulation's scope to avoid discouraging circular and resource-efficient practices.
- The draft also specifies that test samples, packaging materials used to carry another product, and accessory items like user manuals are not covered by the EUDR unless they are placed on the market independently.

These targeted fixes are intended to ensure a more straightforward application of the regulation, prevent disruptions at EU borders, and reduce administrative costs. The proposal is currently subject to a stakeholder consultation and a public feedback period before its final adoption.

ELV: EU Proposes Landmark Circularity Rules for the Automotive Sector

On **July 3, 2025**, the European Parliament's committees for Environment and Internal Market introduced a [comprehensive proposal for a new regulation](#) to transform the automotive industry. The plan is that it will replace the existing End-of-Life Vehicles (ELV) Directives, establishing an ambitious framework for the entire lifecycle of a vehicle, from design to end-of-life management, with a core focus on circular economy principles. The proposal introduces several legally binding requirements for how vehicles are designed and manufactured, with a strong emphasis on the use of recycled materials.

- **Mandatory Recycled Content:** New vehicles shall contain at least **20%** of plastic recycled by weight from postconsumer plastic waste. At least 15% of this target must come from plastic recycled from end-of-life vehicles, creating a "closed-loop" system.
- **Metals and Critical Raw Materials:** The European Commission will be empowered to set future mandatory recycled content targets for **steel and aluminum**. It will also assess setting targets for critical raw materials, such as the rare earth elements used in the permanent magnets of electric vehicle motors.
- **Overall Recyclability:** Each new vehicle type must be designed to be at least **85%** reusable or recyclable and **95%** reusable or recoverable by weight (excluding batteries)
- **Expert Comment on Substances of Concern:** Further, a list of "substances of concern" will be developed. This is in line with the requirements under the Ecodesign for Sustainable Products Regulation (ESPR) and fits into a wider landscape requiring such lists for a number of products, including packaging and batteries¹.
- **Extended Producer Responsibility (EPR):** Manufacturers will be held financially responsible for the vehicles they place on the market throughout their entire lifecycle. This includes covering the net costs of collecting and treating the vehicles after they are discarded. The fees paid by producers will be modulated based on the vehicle's environmental performance, such as its recyclability and the amount of recycled content it contains.
- **Digital Circularity Vehicle Passport:** Within **72 months** of the regulation entering into force, every new vehicle will require a Digital Circularity Vehicle Passport. The manufacturer shall, at the time of placing the vehicle on the market, ensure that the information in the passport is accurate, complete, and up to date. This passport will provide access to crucial

information, including material composition, recycled content data, and instructions for the removal and replacement of key parts, facilitating better repair and recycling.

- **Circularity Strategy:** Manufacturers will be required to develop and submit a "Circularity Strategy" that outlines their actions to comply with the new circularity requirements.

From a strategic perspective, this is a major turning point. It removes the traditional separation between manufacturing, repair, and recycling. The companies that will succeed are not those who see this as a simple compliance task, but those who use it as an opportunity for innovation. They will integrate circular principles into their core strategy to build more resilient supply chains, reduce their dependency on virgin materials, and create a sustainable competitive advantage in the European market

PoP: EU Adopts Stricter Limits for PFOS

On June 27, 2025, the [European Commission adopted stricter](#) restrictions on the persistent organic pollutant (POP) perfluorooctane sulfonic acid (PFOS) and its related compounds.

Previously, under Regulation (EU) 2019/1021, Annex I contained two different "unintentional trace contaminant" limits for PFOS in articles, which created a fragmented system:

- A limit of 0.1% by weight applied to semi-finished products and parts.
- A separate limit of 1 ug/m² applied specifically to textiles and other coated materials.

The new amendment fundamentally changes this approach. It removes the separate 1 ug/m² limit for coated materials and establishes a single, much lower threshold for all substances, mixtures, and articles.

The new regulation sets the following limits for "Perfluorooctane sulfonic acid (PFOS), its salts and PFOS-related compounds":

- The maximum concentration for PFOS and its salts is set at 0.025 mg/kg (0.0000025% by weight).
- The maximum concentration for the sum of all PFOS-related compounds is set at 1 mg/kg (0.0001% by weight).

Switzerland

REACH: Switzerland Proposes Major Update to Chemical Regulations to Align with EU

Switzerland has [announced a revision to its Chemical Risk Reduction Ordinance \(ORRChem\)](#), aiming to harmonize its national rules with recent amendments to the EU's REACH regulation and international commitments under the Stockholm Convention. The proposed update, scheduled for adoption in November 2025 and expected to enter into force on December 1, 2025, introduces sweeping new restrictions across several key chemical groups.

A primary focus of the proposal is on strengthening controls for persistent organic pollutants (POPs) and per- and polyfluoroalkyl substances (PFAS). The revision will prohibit the manufacture, placing on the market, and use of **Dechloran Plus** and **UV-328**, including in articles.

Furthermore, existing rules on PFAS will be expanded with a new ban on **perfluorohexanoic acid (PFHxA)** and its precursors. This will directly impact products such as certain textiles, food contact papers, ski waxes, and cosmetics.

The update also targets several substances widely used in industrial and consumer goods. A ban will be introduced on intentionally added **microplastics** in preparations like cosmetics, detergents, and fertilizers, as well as in infill granules for synthetic sports surfaces.

New restrictions will also be adopted for **lead** in PVC products, although exemptions for recovered PVC will be included to support circular economy goals. To protect public health, the proposal sets new emission limits for **formaldehyde** from articles and vehicles to address indoor air quality concerns.

Finally, the draft introduces stricter rules for **ozone-depleting substances** and various **fluorinated gases** (including F-gases and HFOs), targeting their use in foams, aerosol dispensers, and refrigeration systems. This measure helps Switzerland meet its international obligations under the Montreal Protocol while also addressing concerns that some of these substances can degrade into other persistent PFAS in the atmosphere.

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@dxs.com.

Your CDX Team

Newsletter has been obtained in collaboration with



Thank you for your continued use of CDX.

Best regards,

Your CDX Team

Key Links:

[CDX Homepage](#)

[CDX Release Notes](#)

[CDX Application](#)

Contact us:

DXC Technology

CDX Team E-Mail: cdx-info@dxs.com

[Unsubscribe](#)