



Dear CDX Newsletter Subscriber,

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. Also, as active members of organizations such as IAEG, AEM, AIAG, and IPC, we ensure that CDX remains at the forefront of industry requirements.

As we wrap up Q4 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@dxs.com.

Thank you,

Your CDX Team

Table of Contents

Global & Strategic Updates	3
Global: RMI Template Updates (EMRT v2.1 and AMRT v1.3)	3
EU (Strategic): European Commission Announces Discontinuation of SCIP Database	4
EU (Strategic): Deforestation Regulation (EUDR) Amended Timeline (Delay to 2026/2027)	4
North America	5
US (Federal): EPA Proposes to Narrow TSCA PFAS Reporting Requirements	5
USA (State - Maine): Strict Process for "Currently Unavoidable Use" Exemptions	6
USA (State - Minnesota): Finalized PFAS Reporting Rules (PRISM System)	6
USA (State - New Mexico): Proposed Disclosure Rules for Durable Goods	7
Canada: Federal Plastics Registry Phases 2 & 3 Delayed	8
Asia-Pacific (APAC)	9
China: RoHS Draft Amendments (GB 26572-2025)	9
Japan: CSCL Updates (Bans on PFHxS, Chlorpyrifos, MCCP) & Stockholm Alignment	9
European Union: Sustainability, ESG & Circular Economy	11
ESG & Reporting: Agreement to Simplify CSRD and CSDDD Requirements	11
ESG & Reporting: EFRAG Clarifies Chemical Reporting in ESRS E2	12
CBAM: Simplified Rules for Carbon Border Adjustment Mechanism	12
Digital Product Passport (DPP): Parliament Adopts Resolution for EU Product Act	13
Batteries: ECHA Substance Study & Commission Labeling Standards	14
Call for Evidence: Substances of Concern in Batteries	14
Proposed Harmonized Labeling Specifications	14
Batteries (National Impl.): Germany Adopts Batt-EU-AnpG (Aligning with EU Law)	14
Packaging: Suspension of Authorized Representative Requirement & Reuse Exemptions	15
Suspension of Authorized Representative Requirement	15
Draft Exemptions for Plastic Wrappings and Straps	15
End-of-Life Vehicles (ELV): Council and Parliament Strike Deal	16
Critical Raw Materials: Commission Proposes New EU Centre	16
Advanced Materials: Public Consultation on New Act	17
Taxonomy: RoHS Alignment Amendment Scrutiny Extension	17
European Union: Chemicals & Restricted Substances	18
PFAS Universal Restriction: Summary of Proposal Updates & Upcoming Consultations	18
Updated Proposal Summary and Background	18
SEAC Draft Opinion and Upcoming Consultation	18
Committee Progress: December 2025 Highlights	18

Webinar Resources.....	19
PFAS (Specific): REACH XVII Restriction on Firefighting Foams Published	19
REACH Authorisation: ECHA Recommends 4 New Substances for Annex XIV	20
REACH (Enforcement): Forum Finds High Non-Compliance in Imported Products	20
REACH (SVHC): ECHA Adds DBDPE to Candidate List	21
REACH (Planning): Draft Community Rolling Action Plan (CoRAP) 2026-2028.....	21
RoHS: Revised Lead Exemption Clauses (Steel, Aluminum, Copper).....	22
POPs: New Restrictions (Dechlorane Plus, PFOS) & Proposed Additions	23
Dechlorane Plus Restriction	23
Stricter Thresholds for PFOS	23
Proposed Additions: Chlorpyrifos, MCCPs, and Long-Chain PFCAs.....	23
United Kingdom	24
UK REACH: HSE Consults on Adding 3 Substances to Authorisation List.....	24

Global & Strategic Updates

Global: RMI Template Updates (EMRT v2.1 and AMRT v1.3)

On October 17, 2025, the Responsible Minerals Initiative (RMI) released updated versions of the Extended Minerals Reporting Template (EMRT v2.1) and the Additional Minerals Reporting Template (AMRT v1.3).

EMRT v2.1 introduced several enhancements to improve supply chain transparency for cobalt, mica, copper, graphite, lithium, and nickel. Key changes include updated smelter and mine list tabs, addition of "Requester Product Number" and "Requester Product Name" fields in the product list, and refined smelter reference lists. Compliance Data eXchange (CDX) will include functionality for EMRT v2.1 in the upcoming Release 9.0.

AMRT v1.3 now features a new smelter look-up tab containing standardized smelter lists for all covered minerals, along with German language support and enhanced fields for product reference. This template addresses minerals not covered by the CMRT or EMRT and supports due diligence efforts for emerging regulatory requirements.

Companies should transition to these updated versions for current reporting cycles and ensure supply chain partners are informed of the new template requirements.

The most up to date templates available at:

- EMRT: <https://www.responsiblemineralsinitiative.org/reporting-templates/emrt/>
- AMRT: <https://www.responsiblemineralsinitiative.org/reporting-templates/amrt/>

EU (Strategic): European Commission Announces Discontinuation of SCIP Database

(High impact news)

On December 10, 2025, the European Commission issued a formal declaration to the European Parliament and the Council (COM(2025)980) announcing its intention to **discontinue the SCIP database** (Substances of Concern In articles as such or in complex objects). This follows the Commission's initial indication in July 2025 regarding the database's future.

Rationale for discontinuation

The Commission concluded that the SCIP database has proven ineffective in achieving its primary objective: informing waste operators and recycling companies about the presence of hazardous substances in articles. Additionally, the reporting obligation has generated significant administrative burdens for businesses without delivering proportionate value.

Transition to Digital Product Passport (DPP)

The Commission proposes replacing the SCIP reporting requirement through two key initiatives:

- **One Substance, One Assessment (1S1A)** package: This framework will streamline chemical assessment processes under EU chemicals legislation.
- **Digital Product Passport (DPP)**: The Commission will integrate data on Substances of Very High Concern (SVHCs) directly into the DPP framework. This approach eliminates the need for separate database notifications, consolidating compliance data within a unified digital system.

Broader REACH modernization

The Commission reiterated its commitment to undertaking a targeted revision of the REACH Regulation, with objectives to simplify and modernize the legislative framework while strengthening enforcement mechanisms. This revision is part of a broader effort to reduce administrative complexity and improve the practical effectiveness of EU chemicals regulation.

Further details on the Commission's communication are available in the official document [COM\(2025\)980](#).

EU (Strategic): Deforestation Regulation (EUDR) Amended Timeline (Delay to 2026/2027)

The Council and Parliament reached a provisional political agreement on targeted revisions to the EU Deforestation Regulation (EUDR), establishing revised application dates and simplified due diligence procedures based on stakeholder feedback regarding implementation capacity.

The regulation will apply from December 30, 2026, for large and medium-sized operators, with an extended deadline of June 30, 2027, for micro and small operators. This phased approach provides differentiated timelines while maintaining unified market compliance standards.

The co-legislators introduced several measures to reduce administrative burden:

- Streamlined operator responsibility: Due diligence statements are required exclusively from the operator first placing products on the EU market. Downstream operators need only collect and retain reference numbers, eliminating cascading declaration requirements.
- SME provisions: Micro and small primary operators submit a one-time simplified declaration and receive a declaration identifier for traceability purposes.
- Scope refinement: Printed products (books, newspapers, printed pictures) are excluded from regulatory scope.
- System reliability: Competent authorities must report IT system disruptions to ensure operational continuity.

The revised timeline reflects operational realities without diminishing environmental standards. The Commission will conduct a simplification review by April 30, 2026, to assess administrative burden, particularly for smaller operators.

For compliance teams, this extension enables development of robust data systems aligned with broader supply chain transparency requirements found in the Battery Regulation and Digital Product Passport framework. The core regulatory objective - full supply chain transparency - remains unchanged.

The amended Regulation entered into force on December 26, 2025. The final text is available [here](#).

North America

US (Federal): EPA Proposes to Narrow TSCA PFAS Reporting Requirements

The Environmental Protection Agency (EPA) published a proposed rule on November 13, 2025, to amend the Toxic Substances Control Act (TSCA) Section 8(a)(7) PFAS reporting regulation. The comment period has now closed, with deadlines of December 15, 2025, for information collection provisions and December 29, 2025, for general comments on the proposed rule.

Background

TSCA Section 8(a)(7), added by the National Defense Authorization Act for Fiscal Year 2020, required EPA to establish reporting requirements for all companies that manufactured or imported PFAS for commercial purposes between January 1, 2011, and December 31, 2022. This mandate covered detailed information on PFAS identity, volumes, uses, exposure, and disposal.

Proposed exemptions

EPA proposes to exempt several categories from PFAS reporting requirements:

- PFAS at or below 0.1% concentration in mixtures or products
- Articles containing PFAS would no longer trigger reporting obligations
- PFAS manufactured solely as byproducts, impurities, or non-isolated intermediates
- Small quantities used exclusively for R&D purposes

The reporting window was opened for 60 days until December 29, 2025.

Next steps

With these exemptions, EPA estimates approximately 255 entities would remain subject to reporting, down from thousands previously anticipated. EPA is currently reviewing comments and will issue a final rule. If finalized as proposed, this change would eliminate reporting obligations for a large population of article importers while maintaining requirements for direct PFAS manufacturers and importers.

Further details on the proposed amendments are available in the [EPA's official press release](#).

USA (State - Maine): Strict Process for "Currently Unavoidable Use" Exemptions

Maine's PFAS in Products Program, enacted in 2021 under LD1503, prohibits the sale and distribution of products containing intentionally added PFAS according to a phased timeline. The first prohibition took effect on January 1, 2023, with subsequent deadlines on January 1, 2026 (now passed), January 1, 2032, and January 1, 2040.

Currently Unavoidable Use (CUU) exemptions

The legislation allows for Currently Unavoidable Use (CUU) exemptions when manufacturers can demonstrate that PFAS is essential for health, safety, or the functioning of society and that no reasonably available alternatives exist. However, Maine's Board of Environmental Protection has established a stringent review process. CUU exemption applications may be submitted between 18 and 60 months before the applicable deadline. For the January 1, 2032 prohibition, applications may be submitted between January 1, 2027, and July 1, 2030. Granted exemptions are valid for five years and require reapplication.

In the first round of CUU exemption applications for the 2026 deadline, the Board granted only 2 out of 11 requests. The approved exemptions cover an internal cartridge valve and vented cap liner for cleaning product containers, valid until January 1, 2031.

Compliance considerations

The low approval rate (18%) in the first round demonstrates Maine's strict interpretation of "currently unavoidable" status. Companies planning to seek exemptions should begin evaluation and documentation of essentiality and alternative analysis well in advance of submission deadlines.

Detailed instructions and requirements for the application process are available on the [Maine Department of Environmental Protection's CUU guidance page](#).

USA (State - Minnesota): Finalized PFAS Reporting Rules (PRISM System)

The Minnesota Pollution Control Agency (MPCA) has adopted final administrative rules for PFAS reporting in products, establishing the regulatory framework that will require manufacturers to disclose per- and polyfluoroalkyl substances in goods sold in the state starting July 1, 2026.

Background

The new rules implement *Amara's Law* (enacted May 2023) and introduce several provisions designed to streamline compliance, including:

- **Group reporting options** allowing multiple manufacturers or brands to report together.
- **Concentration ranges** accepted in place of exact chemical amounts.
- **Formal processes** for waivers, deadline extensions, and trade secret protections.
- **Product grouping** to allow reporting on categories of similar products.

A one-time flat fee of **\$800 per manufacturer** has been established to fund program implementation.

Reporting requirements and scope

The mandate applies to manufacturers, importers, and private labelers of products sold or distributed in Minnesota, including online sales. Reporting is required for any product or component containing intentionally added PFAS.

To facilitate this, the MPCA will launch the PFAS Reporting and Information System for Manufacturers (PRISM). Following a soft launch in December 2025, the system became fully available to all manufacturers in January 2026. Designed with interoperability in mind, PRISM may help manufacturers satisfy reporting obligations for other states with similar requirements.

Timelines:

- **January 2026:** PRISM system opens for general use.
- **July 1, 2026:** Deadline for submitting initial reports (extended by six months).
- **February 1 (Annually):** Due date for subsequent annual updates.

Although the initial deadline is July 2026, the complexity of supply chain data collection means companies should already be engaged in supplier outreach and product mapping. Reported data that is not designated as a trade secret will eventually be made accessible to the public.

This framework supports Minnesota's broader goal of phasing out all nonessential PFAS use by 2032.

Further details on the reporting requirements and the PRISM system are available on the: [Reporting PFAS in products | Minnesota Pollution Control Agency](#)

USA (State - New Mexico): Proposed Disclosure Rules for Durable Goods

New Mexico's Environment Department (NMED) has released proposed rules to implement the PFAS Protection Act (HB 212), introducing significant disclosure requirements for manufacturers of "complex durable goods."

New labeling and disclosure obligations

The proposed rules mandate that the operation and maintenance (O&M) manual for complex durable goods must include a formal statement indicating the presence of intentionally added PFAS. This disclosure must use department-approved wording and symbols, followed by **a complete list of all component parts** containing intentionally added PFAS. Critically, the regulation requires "sufficient detail" regarding the location of these components within the product, ensuring they can be "readily located" by end-users or waste handlers.

Key definitions and scope

The proposal defines a **"complex durable good"** as a manufactured good composed of **100 or more manufactured components** with an intended useful life of **five or more years**, where the product is typically not consumed or discarded after a single use. Stakeholders have noted the importance of this precise definition to prevent the regulation from capturing out-of-scope products.

Concerns have been raised regarding the practical application of exemptions. The current draft suggests a rigorous "part-by-part" submission process for exemptions rather than broader categorical approvals, which could create significant administrative burdens for complex equipment manufacturers.

Implementation timeline

The public comment period for these proposed rules remains open until **March 31, 2026**. While a final rule is expected within six months of the comment period closing, the tentative effective date is currently targeted for **July 1, 2026**, though this timeline remains subject to change.

Further details on the proposed rule are available in the [New Mexico Environment Department - PFAS Protection Act Rules](#)

Canada: Federal Plastics Registry Phases 2 & 3 Delayed

The Federal Plastics Registry (FPR) is a critical tool for improving understanding of plastic production, use, and management in Canada. This data inventory makes information from across the plastics lifecycle open and accessible to Canadians, supporting the Government of Canada's commitment to evidence-based action to reduce plastic waste and prevent pollution.

Delay announced

Environment and Climate Change Canada (ECCC) has received feedback about the challenges and complexity of reporting for Phases 2 and 3 of the Registry. In response, and in the interests of efficiency, responsiveness, and building a system that works better for stakeholders, **all reporting requirements for Phases 2 and 3 of the Registry will be delayed.**

Phase 1 reporting

Organizations must continue to report **Phase 1 data for the 2024, 2025, and 2026 calendar years** as outlined in the *Notice with respect to reporting of plastic resins and certain plastic products for the Federal Plastics Registry for 2024, 2025 and 2026*. This means that producers of packaging, electronics and electrical equipment, and single-use or disposable plastics destined for the residential waste stream must continue to report by **September 29** of the following year.

Further details on the Federal Plastics Registry and reporting requirements are available on the [Government of Canada's Federal Plastics Registry webpage](#) and in the [official Canada Gazette Notice](#).

Asia-Pacific (APAC)

China: RoHS Draft Amendments (GB 26572-2025)

China has released a draft standard, **GB 26572-2025**, titled *Requirements for Restricted Use of Hazardous Substances in Electrical and Electronic Products*. This represents the first major amendment to the GB 26572-2011 standard since 2018. The update aims to repeal, integrate, and refine current substance and labeling standards (merging GB 26572-2011 and SJ/T 11364-2024) to align more closely with the **EU RoHS Directive (2011/65/EU)**.

Key changes

The standard outlines normative references, definitions, and classification of Electrical and Electronic Products (EEPs), separating them into two categories:

- **Category I:** Products listed in the *Catalogue for Compliance Management of Restricted Use of Hazardous Substances in EEPs*. These must comply with limits for 10 hazardous substances and mandatory labeling requirements.
- **Category II:** Products not listed in the Catalogue. These are encouraged to comply with substance limits but must comply with mandatory labeling requirements.

Mandatory labeling now officially supports **digital formats**, such as QR codes. Additionally, content regarding disassembly instructions and examples from the previous 2011 version has been removed.

Transition timeline

The implementation introduces a phased transition period:

- **Until Dec 31, 2025:** Companies may use either the old GB/T 26572-2011 (with/without Amendment 1) or the new GB 26572-2025.
- **Jan 1, 2026 - Jul 31, 2027:** Only GB/T 26572-2011 (with Amendment 1) or GB 26572-2025 may be used.
- **From Aug 1, 2027:** All conformity assessments must follow GB 26572-2025.

Products previously assessed under the 2011 standard (without amendment) that are still manufactured or imported after Jan 1, 2026, must switch to the amended version or the new 2025 standard by Jan 1, 2027. Products compliant with the amended 2011 version can transition to the 2025 standard naturally (e.g., at certificate renewal).

Further details on the draft standard are available in Chinese on the [official standards platform](#).

Japan: CSCL Updates (Bans on PFHxS, Chlorpyrifos, MCCP) & Stockholm Alignment

Following recent decisions by the Stockholm Convention on Persistent Organic Pollutants (POPs), the Japanese government has launched parallel initiatives to designate several hazardous substance groups as Class I Specified Chemical Substances under the Chemical Substances Control Law (CSCL). These amendments aim to fulfill Japan's international obligations by imposing strict bans on manufacture, import, and use.

PFHxS Restrictions (Consultation on Amendments)

The proposed amendment designates PFHxS-related substances as Class I Specified Chemical Substances under the *Chemical Substances Control Law (CSCL)*. This designation

imposes a general prohibition on the manufacture, import, and use of these substances. Products containing PFHxS-related substances may also face import restrictions or be required to comply with specific technical standards and labeling obligations.

The draft proposal also removes previously permitted exceptional uses for 8:2 fluorotelomer alcohol (CAS No. 678-39-7). Authorities have determined that these applications no longer meet the "difficult to substitute" criteria, effectively eliminating the exemption.

Further details on the consultation and proposed amendments are available in Japanese on the [e-Gov Public Comment portal](#).

Chlorpyrifos, MCCP, and Long-chain PFCAs (New Consultation)

Building on these efforts, a separate consultation opened on December 18, 2025, specifically targeting three additional substance groups following the Stockholm Convention's COP-12 decisions:

- Chlorpyrifos (CAS No. 2921-88-2)
- Chlorinated paraffins with carbon chain lengths C14 - 17 and chlorination levels $\geq 45\%$ by weight (MCCPs).
- Long-chain perfluorocarboxylic acids (PFCAs), their salts, and related compounds with carbon chain lengths C9 - 21.

Designation as Class I Specified Chemical Substances effectively prohibits the manufacture and use of these chemicals. Furthermore, the proposal lists specific products that will be prohibited from import if they contain these substances:

- Chlorpyrifos: Wood insecticides.
- MCCPs: Plasticizers for resins; flame-retardant additives for textiles, resins, and rubber; lubricating, cutting, and hydraulic oils; paints; adhesives; sealants; and water-repellent agents.
- Long-chain PFCAs: Professional-use photographic films; lubricating oils; paints; water/oil-repellent agents; adhesives; sealants; fire-extinguishing agents/foams; waxes; and water/oil-repellent textiles, clothing, and floor coverings.

Next steps

This regulatory action aligns Japan's framework with international obligations under the Stockholm Convention. Non-compliance may result in mandatory recovery orders to prevent environmental contamination. Stakeholders are invited to submit comments on the proposal until February 6, 2026.

Further details on the proposed restrictions and product categories are available in the [WTO TBT Notification](#) and the official Japanese [public comment portal](#).

European Union: Sustainability, ESG & Circular Economy

ESG & Reporting: Agreement to Simplify CSRD and CSDDD Requirements

On December 9, 2025, the European Council and the European Parliament announced a provisional agreement to simplify the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD). The agreement aims to reduce reporting burdens and limit cascading obligations on smaller companies while maintaining robust sustainability and due diligence standards.

Revised thresholds under CSRD

The simplified CSRD framework raises reporting thresholds significantly:

- **EU companies:** Must have **at least 1,000 employees and EUR 450 million in net turnover**.
- **Non-EU companies:** Must generate at **least EUR 450 million in net turnover within the EU**, plus maintain an EU branch or subsidiary generating at least **EUR 200 million in annual turnover**.
- **Financial holdings** are excluded from the scope.

These revised thresholds represent a substantial increase compared to the original directive, effectively narrowing the number of companies subject to mandatory sustainability reporting.

Revised thresholds under CSDDD

For due diligence obligations, the agreement establishes the following criteria:

- **EU companies:** Must have at least **5,000 employees and EUR 1.5 billion in net turnover**.
- **Non-EU companies:** Must generate at least **EUR 1.5 billion in net turnover within the EU**.

Timeline

The provisional agreement proceeded through the EU legislative process on an expedited schedule:

- **December 11, 2025:** Vote by the JURI Committee (Committee on Legal Affairs).
- **December 16, 2025:** Plenary vote in the European Parliament.

This streamlined approach reflects the urgency to provide regulatory clarity and reduce compliance complexity for businesses operating within the EU.

Further details on the agreement are available in the [European Council's press release](#).

ESG & Reporting: EFRAG Clarifies Chemical Reporting in ESRS E2

EFRAG has published drafts of the revised and simplified European Sustainability Reporting Standards (ESRS), specifically targeting the environmental standard **E2 (Pollution)**. The update introduces critical clarifications regarding the disclosure requirements for **Substances of Concern (SoC)** and **Substances of Very High Concern (SVHC)**.

Reporting scope

The revised draft distinguishes reporting obligations based on the company's role in the supply chain:

- **Chemical Industry (Manufacturers, Formulators, Importers of Substances):** Under amended Section 17, these entities must disclose the total weight of both SoCs and SVHCs that are procured, manufactured, placed on the market, or released into the environment.
- **Non-Chemical Industry (Downstream Users, Article Manufacturers):** Under amended Sections 18 and 19, the reporting obligation is significantly narrower. For market participants outside the chemical sector, the requirement focuses on the provision of information about SVHCs only.
 - o Users of substances must disclose the total weight of SVHCs used or released.
 - o Article manufacturers/importers need only disclose the names of SVHCs present in concentrations above 0.1% w/w (aligned with REACH Article 33).

This distinction means downstream companies are not required to report on the broader category of "Substances of Concern," which includes other hazardous chemicals (e.g., carcinogens, mutagens, or substances affecting recycling) unless they are specifically classified as SVHCs.

Next steps

On December 2, 2025, EFRAG published its technical advice on these amended drafts. The European Commission will use this advice as the basis for a Delegated Act to officially amend the ESRS, with adoption expected by mid-2026.

Further details on the draft standards and technical advice are available on the [EFRAG website](#) and in the [Technical Advice Cover Letter](#).

CBAM: Simplified Rules for Carbon Border Adjustment Mechanism

The European Commission has published official simplifications to the Carbon Border Adjustment Mechanism (CBAM), which will apply starting January 1, 2026. These updates are designed to ease the administrative burden for importers during the ongoing transitional phase, which began in October 2023.

The updates introduce streamlined reporting requirements and establish default values for embedded emissions in imported goods. These changes specifically target key sectors covered by the mechanism, including:

- Iron and steel
- Aluminum
- Cement
- Fertilizers

- Electricity
- Hydrogen

Compliance deadlines and obligations

Companies importing these materials into the EU must assess how simplified procedures impact their compliance strategy. Critical upcoming deadlines include:

- **March 31, 2026:** Deadline for importers expecting to exceed the 50-tonne threshold to apply for **Authorized CBAM Declarant** status.
- **September 30, 2027:** Deadline for the first full compliance cycle, requiring submission of the 2026 emissions report and surrender of corresponding CBAM certificates.

Enforcement

The update does not introduce new penalties; however, strict enforcement mechanisms remain under the broader framework. Importers failing to surrender sufficient certificates face fines of approximately **EUR 100 per tonne of CO₂** not covered. Furthermore, unauthorized importers exceeding the exemption threshold may be liable for penalties on all emissions generated during that year.

Further details on the simplified rules are available on the [European Commission's Taxation and Customs website](#).

Digital Product Passport (DPP): Parliament Adopts Resolution for EU Product Act

On October 21, 2025, the European Parliament adopted a resolution titled *"New legislative framework for products that is fit for the digital and sustainable transition."* This resolution lays the groundwork for the upcoming EU Product Act, a key initiative scheduled for the European Commission's 2026 Work Plan.

Expanding the Digital Product Passport (DPP)

The resolution effectively serves as a strategic roadmap for the Commission, proposing the introduction of a horizontal Digital Product Passport (DPP) for *all* products sold in the EU, including second-hand goods. Key proposals include:

- Harmonized information requirements across product categories.
- Enhanced access rights for market surveillance, customs authorities, repairers, and refurbishers.
- Replacement of traditional Declarations of Conformity (DoCs) with digital solutions.
- Interoperability between the DPP registry and systems like the EU Safety Gate, market surveillance platforms, and the EU Customs Data Environment.

Further details on the resolution are available in the [European Parliament's adopted text](#).

Batteries: ECHA Substance Study & Commission Labeling Standards

The European regulatory framework for batteries continues to evolve, with new initiatives focused on identifying hazardous substances and standardizing labeling requirements under Regulation (EU) 2023/1542.

Call for Evidence: Substances of Concern in Batteries

On November 12, 2025, the **European Chemicals Agency (ECHA)** launched a call for evidence to support the preparation of a critical study report required under the Batteries Regulation. The European Commission is mandated to identify substances of concern in batteries - particularly those that may hamper recycling processes - by December 31, 2027. To meet this deadline, ECHA is now collecting technical data on substances used in manufacturing, present in finished batteries, or emitted during recycling.

This initiative seeks input from stakeholders across the entire battery supply chain, including manufacturers, recyclers, and downstream users. The collected evidence will be instrumental in future regulatory decisions aimed at minimizing environmental impacts and promoting circularity in the sector. Further details on the scope of the study and submission guidelines are available on the [ECHA call for evidence page](#).

Proposed Harmonized Labeling Specifications

On December 22, 2025, the European Commission notified the World Trade Organization (WTO) of a draft Implementing Regulation regarding harmonized specifications for battery labeling. This proposal establishes standardized rules for implementing the requirements of Articles 7 and 13 of Regulation (EU) 2023/1542. Article 7 specifically governs the carbon footprint declaration, while Article 13 covers general marking and labeling obligations for all battery categories.

To comply with these emerging standards, manufacturers must maintain precise data on the chemical composition of their products. This includes knowing the names and concentrations of restricted and hazardous substances (as defined in Article 4), as well as identifying any critical raw materials present in concentrations above 0.1% by weight (w/w). Compliance Data eXchange (CDX) can facilitate the collection and management of this granular supply chain data, which is now required for all battery types.

The draft regulation is scheduled for adoption by April 20, 2026, with the public comment period open until January 26, 2026. Full text of the proposal and detailed design specifications can be found in the [WTO notification documents](#) and [Annex on label design](#).

Batteries (National Impl.): Germany Adopts Batt-EU-AnpG (Aligning with EU Law)

Germany's Federal Law Gazette has published the *Act on the Adaptation of Battery Law to Regulation (EU) 2023/1542* (Batt-EU-AnpG), updating national requirements to align with the EU Battery Regulation and repealing the previous German Battery Act of 25 June 2009 (which was set to expire on 6 October 2025).

The Act applies to batteries and waste batteries within the scope of the EU Battery Regulation, while confirming that the regime does not apply to batteries covered by Article 1(5) and (6) of Regulation (EU) 2023/1542 (e.g., certain batteries incorporated into or specifically designed for military equipment related to essential security interests, and batteries intended for space-use equipment).

In addition to aligning operator obligations - particularly around Extended Producer Responsibility (EPR) and market surveillance - the Act includes an annexed fee schedule covering administrative activities under the updated framework.

Further details are available in the published legal text in the [Federal Law Gazette](#).

Packaging: Suspension of Authorized Representative Requirement & Reuse Exemptions

The European Commission has advanced two significant initiatives affecting packaging compliance, aiming to reduce administrative burdens while refining reuse obligations under the new regulatory framework.

Suspension of Authorized Representative Requirement

On December 10, 2025, the European Commission announced a temporary suspension of the requirement for packaging producers to appoint an authorized representative in each Member State to comply with **Extended Producer Responsibility (EPR)** obligations. This measure, introduced as part of the Commission's environmental "omnibus" simplification package, will apply until **January 1, 2035**. The suspension is designed to alleviate administrative costs for businesses, particularly small and medium-sized enterprises (SMEs), without altering the core objectives of the Packaging and Packaging Waste Regulation.

During this suspension period, producers are no longer mandated to maintain a local representative in every jurisdiction where they operate. Instead, they are granted the flexibility to either continue appointing an authorized representative or to fulfill their registration, reporting, and fee-payment obligations directly. The Commission estimates that this simplification could generate annual cost savings of approximately **EUR 300 million** for the industry. This interim step serves as a precursor to a comprehensive reform of EU EPR rules, with a broader legislative proposal expected in 2026.

Further details on the simplification package and its impact on EPR compliance are available in the [Commission's official press Q&A](#).

Draft Exemptions for Plastic Wrappings and Straps

In parallel, the Commission has introduced a draft delegated act under the **Packaging and Packaging Waste Regulation (PPWR)** to establish specific exemptions from reuse obligations for certain transport packaging materials. The proposal specifically **targets plastic wrappings and straps** used to secure goods during transport, recognizing that reuse requirements for these specific items may often be technically or economically impractical.

By allowing targeted exemptions, the Commission aims to ensure that circularity requirements do not inadvertently disrupt essential transport functions. Stakeholders were invited to provide feedback on the proposal, with the comment period closing on January 9, 2026.

Full text of the draft act and background information can be found on the [Commission's "Have Your Say" portal](#).

End-of-Life Vehicles (ELV): Council and Parliament Strike Deal

The European Council presidency and Parliament representatives have reached a provisional agreement on a new regulation concerning circularity requirements for vehicle design and the management of end-of-life vehicles (ELVs). This regulation will replace existing directives, significantly expanding the scope and strengthening obligations for the automotive sector.

The new rules extend beyond passenger cars and light commercial vans to now include **trucks, buses, motorcycles, and special purpose vehicles**. A core element of the agreement is the introduction of mandatory recycled content targets for new vehicles, specifically for plastics:

- 15% required within 6 years.
- 25% required within 10 years.
- At least 20% of this recycled plastic must come from closed-loop recycling (recovered from ELVs).

Future targets for **recycled steel, aluminum, magnesium, and critical raw materials** will be established by the Commission following a feasibility study.

Extended Producer Responsibility (EPR)

The agreement significantly strengthens Extended Producer Responsibility (EPR), making **manufacturers financially and organizationally responsible for the entire vehicle lifecycle**, including free take-back and proper treatment. A cross-border EPR mechanism will ensure producers remain responsible regardless of the Member State where the vehicle reaches its end of life.

Combating illegal exports

To address the issue of 3.5 million "missing vehicles" annually, the regulation introduces strict criteria to distinguish between used vehicles and ELVs. Vehicles meeting ELV criteria cannot be exported or sold as used. Additionally, a ban on the export of non-roadworthy used vehicles to non-OECD countries will apply 5 years after entry into force.

Next Steps

The provisional agreement must now be formally endorsed by the Council and Parliament. The regulation will start applying 2 years after its entry into force.

Further details on the agreement are available in the [Council's press release](#).

Critical Raw Materials: Commission Proposes New EU Centre

The European Commission has launched an initiative proposing the establishment of a **European Union Critical Raw Materials Centre**. This regulation aligns with the strategic recommendations of the **Draghi Report**, aiming to centralize and coordinate EU-level actions to secure supply chains for essential materials.

The proposed Centre is designed to strengthen supply security and reduce external dependencies through four key operational pillars:

- Facilitating aggregated procurement to leverage the EU's market power.

- Coordinating reserve capacities to buffer against supply disruptions.
- Directing funding toward critical projects to boost domestic capacity.
- Monitoring global markets and supply risks.

Next Steps

The initiative reflects the EU's urgent focus on competitiveness and strategic autonomy in the raw materials sector. A public consultation on the regulation is expected to open shortly.

Further details on the initiative and the underlying strategic recommendations can be found on the [Commission's "Have Your Say" portal](#) and in the [Draghi Report on European Competitiveness](#).

Advanced Materials: Public Consultation on New Act

On October 21, 2025, the European Commission launched a call for evidence and public consultation for a proposed Advanced Materials Act. The submission period for stakeholder feedback concluded on January 13, 2026.

Strategic importance

Advanced materials are expected to play a pivotal role in the future of European industry, including applications like bio-based materials, sodium-ion batteries or recyclable carbon-reinforced plastics.

The initiative aims to secure a competitive and sustainable industry by supporting investment in critical production capacities within the EU. Future rules will likely focus on creating closed-loop production systems and enhancing recycling capabilities to reduce waste, lower costs, and mitigate supply chain dependencies on third countries.

Next steps

Although the regulatory process is in its early stages, the focus on circularity suggests potential implications for product data management. Companies are advised to monitor developments closely as new requirements for material efficiency and tracking could emerge.

Further details on the initiative are available on the [European Commission's "Have Your Say" portal](#).

Taxonomy: RoHS Alignment Amendment Scrutiny Extension

On October 6, 2025, the European Parliament's ECON and ENVI committees held a joint scrutiny session to review the Commission's recent amendment to the EU Taxonomy Regulation. This amendment, originally proposed in July, seeks to align the Taxonomy's "Do No Significant Harm" criteria with exemptions under the RoHS Directive (Annex III and IV).

Scrutiny period extended

Following the October session, Parliament and Commission representatives announced an extension of the scrutiny period by two months. The deadline for the Parliament or Council to potentially oppose the measure has now been pushed to **January 5, 2026**.

This delay impacts the final adoption of the amendment, which aims to resolve a critical compliance gap where products utilizing valid RoHS exemptions could technically fail Taxonomy sustainability criteria.

Strategic implications

The ongoing scrutiny highlights the complexity of harmonizing material compliance across different EU frameworks. The explicit linkage between RoHS exemptions and EU Taxonomy criteria confirms that regulatory alignment remains a priority, though definitions (e.g., "hazardous substances" vs. "substances of concern") continue to pose implementation challenges for industry substance management systems.

Further details regarding the legislative procedure can be found in the [European Parliament's ENVI Committee newsletter](#).

European Union: Chemicals & Restricted Substances

PFAS Universal Restriction: Summary of Proposal Updates & Upcoming Consultations

The regulatory process for the EU-wide restriction of per- and polyfluoroalkyl substances (PFAS) has advanced significantly in recent months, with new guidance from national authorities and key milestones approaching for ECHA's scientific committees.

Updated Proposal Summary and Background

On October 15, 2025, the five national authorities (Germany, Netherlands, Sweden, Norway, and Denmark) published a summary of the updated Background Document for the universal PFAS restriction proposal. This document outlines the environmental and human health risks associated with PFAS and assesses the proportionality of various restriction options. It serves as the foundational justification for the restriction under the REACH Regulation.

SEAC Draft Opinion and Upcoming Consultation

The Committee for Socio-Economic Analysis (SEAC) is expected to agree on its draft opinion in March 2026. Shortly thereafter, ECHA will launch a 60-day stakeholder consultation. This consultation will cover general aspects of the opinion as well as detailed, sector-specific questions for 14 evaluated sectors and PFAS manufacturing.

To assist stakeholders in preparing, ECHA has published an initial use mapping document aligning specific uses with the sectors evaluated by SEAC. An update to this mapping will follow the December plenary. Stakeholders are strongly encouraged to review this mapping to identify which sector-specific evaluation applies to their activities, as questions will be highly use-specific.

Detailed mapping information is available in ECHA's [Draft Use Mapping Document](#), and guidance for respondents can be found [here](#).

Committee Progress: December 2025 Highlights

In their December meetings, the Risk Assessment Committee (RAC) and SEAC reached provisional conclusions on PFAS manufacturing, while SEAC also concluded evaluations for electronics and semiconductors. Both committees continued examining horizontal issues

relevant to the entire restriction, including concentration limits, PFAS management plans, recycling, spare parts, and enforceability.

The committees aim to finalize discussions in March 2026, with RAC adopting its final opinion and SEAC agreeing on its draft opinion, which will then trigger the consultation period.

Webinar Resources

On October 30, 2025, ECHA hosted a webinar to guide stakeholders on the upcoming SEAC consultation. The session provided critical insights into regulatory expectations and data requirements. Recordings and presentation materials from this event are available on the [ECHA webinar page](#).

PFAS (Specific): REACH XVII Restriction on Firefighting Foams Published

On October 23, 2025, the European Commission published a new amendment to Annex XVII of the REACH Regulation, adding **Entry 82** to restrict the use of per- and polyfluoroalkyl substances (PFAS) in firefighting foams. This broad restriction covers the entire PFAS class to prevent "regrettable substitution" and address the persistence criteria outlined in Annex XIII.

Phase-Out timeline

The regulation imposes a general ban on the use and placing on the market of firefighting foams containing a total PFAS concentration of **1 mg/L or greater**, effective from **October 23, 2030**. However, to manage the transition, sector-specific deadlines have been established for placing restricted foams on the market:

- **October 23, 2026:** Ban applies to foams in portable fire extinguishers.
- **April 23, 2027:** Ban applies to alcohol-resistant foams in portable fire extinguishers.
- **October 23, 2035:** Ban applies to foams used in establishments covered by the Seveso III Directive (excluding aviation), offshore oil and gas installations, military vessels, and civilian ships with foam placed on board before October 23, 2025.

Existing restrictions on specific subgroups (e.g., PFOS, PFOA, PFHxA, C9-C14 PFCAs) remain in force, but these substances contribute to the cumulative concentration limit under this new entry.

Obligations for users

Even before the full ban, new obligations for the "use" of PFAS-containing foams (including storage) take effect starting October 23, 2026:

- Users must minimize emissions to the environment and human exposure.
- Unused foams and PFAS-containing waste (including wastewater) must be collected separately and treated to destroy or irreversibly transform the PFAS content.
- Users must establish and maintain a site-specific "PFAS-containing firefighting foams management plan," which must be kept available for inspection for 15 years.

Labeling requirements

From **October 23, 2026**, restricted foams (excluding portable extinguishers) placed on the market must carry a warning label in the official language of the Member State: *"WARNING: Contains per- and polyfluoroalkyl substances (PFAS) with a concentration equal to or greater*

than 1 mg/L for the sum of all PFAS." This requirement also extends to users labeling waste and unused stock.

Full details of the restriction can be found in the official text of [Commission Regulation \(EU\) 2025/1988](#).

REACH Authorisation: ECHA Recommends 4 New Substances for Annex XIV

On November 18, 2025, the European Chemicals Agency (ECHA) issued a formal recommendation to the European Commission to add four new substances to the REACH Authorisation List (Annex XIV). These substances were prioritized from the Candidate List due to their high potential for adverse effects on human health and the environment.

Recommended substances

The four substances recommended for inclusion are:

- Melamine (Carcinogenic, affects kidneys) - *Widely used in plastics, foams, and coatings.*
- Diphenyl(2,4,6-trimethylbenzoyl)phosphine oxide (Toxic to reproduction) - *Used in photo-initiators, inks, and coatings.*
- Barium diboron tetraoxide (Toxic to reproduction) - *Used in paints and coatings.*
- S-(tricyclo[5.2.1.0^{2,6}]deca-3-en-8(or 9)-yl) O-(isopropyl or isobutyl or 2-ethylhexyl) O-(isopropyl or isobutyl or 2-ethylhexyl) phosphorodithioate (PBT) - *Used in lubricants and greases.*

Implications for Industry

Once the European Commission adopts this recommendation, these substances will be assigned a "sunset date." After this date, placing them on the market or using them within the EEA will be prohibited unless a specific authorization is granted.

Next steps

The Commission will now decide on the final inclusion and specific conditions. Companies currently using these chemicals should immediately begin assessing alternatives to avoid future business disruption.

Further details on the prioritization rationale are available in [ECHA's 12th Recommendation for the Authorisation List](#).

REACH (Enforcement): Forum Finds High Non-Compliance in Imported Products

On December 10, 2025, the **ECHA Enforcement Forum** released the results of a major EU-wide targeted enforcement project focused on imported goods. The project revealed significant compliance gaps, with inspectors finding that **one in three substances in mixtures** was missing a mandatory REACH registration.

Key findings

Inspectors across **29 EEA countries** conducted **2,603 targeted controls**, checking imported substances, mixtures, and consumer articles for compliance with REACH registration, restriction, and authorization requirements. Beyond the high rate of missing registrations,

controls also identified numerous instances where imported consumer products contained **restricted hazardous substances** in concentrations exceeding legal limits.

These findings highlight the ongoing challenge of ensuring that imported goods meet the same safety standards as those manufactured within the EU. The results underscore the need for importers to rigorously verify their supply chains to avoid market access issues and potential penalties.

Full details and statistical breakdowns of the inspection results are available in the official [Forum REF-12 Project Report](#).

REACH (SVHC): ECHA Adds DBDPE to Candidate List

On November 5, 2025, the European Chemicals Agency (ECHA) officially added one new substance to the Candidate List of Substances of Very High Concern (SVHC). The addition brings the total number of entries on the list to 251.

The newly listed substance is 1,1'-(ethane-1,2-diyl)bis[pentabromobenzene] (DBDPE) (CAS 84852-53-9). It was identified as an SVHC due to its very persistent and very bioaccumulative (vPvB) properties. DBDPE is widely used as an additive flame retardant in plastic and rubber materials, with applications across various industries including electronics, automotive, and textiles. Further details on the inclusion can be found in [ECHA's official press release](#).

REACH (Planning): Draft Community Rolling Action Plan (CoRAP) 2026-2028

On December 9, 2025, the European Chemicals Agency (ECHA) published the draft annual update of the **Community Rolling Action Plan (CoRAP)**, covering the years 2026-2028. This plan identifies substances suspected of posing risks to human health or the environment, prioritizing them for substance evaluation under REACH Regulation (EC) No 1907/2006 (Articles 44-48).

Planned evaluations

The draft CoRAP lists **28 substances** for evaluation over the three-year period:

- 17 substances are scheduled for evaluation in 2026.
- 10 substances are planned for evaluation between 2027 and 2028.
- 8 new substances have been added compared to the previous 2025-2027 plan.
- 1 substance is proposed for withdrawal.

The published list includes non-confidential substance names, EC/List and CAS numbers, initial grounds for concern, and the contact details of the evaluating Member State.

Timeline

The draft was prepared in cooperation with Member States and submitted to the Member State Competent Authorities and the ECHA Member State Committee on November 27, 2025.

- **February 2026:** The Committee is expected to provide its opinion on the draft.
- **March 24, 2026:** ECHA aims to adopt and publish the final CoRAP update.

By publishing the draft early, ECHA intends to facilitate proactive communication between registrants and evaluating Member States.

The full list of substances included in the draft plan is available in the [ECHA Draft CoRAP Update 2026-2028](#).

RoHS: Revised Lead Exemption Clauses (Steel, Aluminum, Copper)

On November 21, 2025, the European Union published three Commission Delegated Directives that revise several lead-related exemptions under the RoHS 2 Directive (2011/65/EU). These updates have significant implications for manufacturers of electrical and electronic equipment (EEE), who must now review their material declarations and supply chains to ensure continued compliance.

The revisions introduce new expiry dates and tightened conditions for lead used in various material categories.

- **Steel Alloys:** The exemption for lead as an alloying element in steel for machining purposes (Entry 6(a)-I) is extended until June 30, 2027, with the lead cap remaining at 0.35%. For hot-dip galvanized steel components (Entry 6(a)-II), the exemption is also extended to June 30, 2027, with a lead cap of 0.2%.
- **Aluminum Alloys:** The exemption for lead in aluminum for machining purposes (Entry 6(b)-II) has been revoked. New applications are banned from December 2025, with a full phase-out required by June 2027. For recycled aluminum (Entry 6(b)-I), the lead cap has been tightened to 0.3%, with expiry dates varying by product category from December 2026 to June 2027.
- **Copper Alloys:** The exemption for copper alloys containing up to 4% lead by weight is extended until June 30, 2027.
- **Other Materials:** Exemptions for lead in certain glass and ceramics, as well as in high melting temperature solders, have been refined into more specific subcategories with an expiry date of December 31, 2027.

Member States are required to transpose these new directives into national law by June 30, 2026. The new provisions will become effective on July 1, 2026.

These changes will accelerate the industry's transition to lead-free alternatives and directly impact supply chains involved in machining, galvanizing, and electronics manufacturing. The revocation of the exemption for machined aluminum is particularly critical, as it requires companies to actively find and validate substitutes for any new products.

Manufacturers must act now to review their product portfolios and material data to identify any reliance on these revised or revoked exemptions. Proactive substitution planning is essential to avoid market access disruptions and ensure a smooth transition ahead of the new deadlines.

Official Legal Acts

You can access the full text of the Delegated Directives via the links below:

- Lead in Alloys (Steel, Aluminum, Copper): [Commission Delegated Directive \(EU\) 2025/2364](#)
- Lead in High-Melting Temperature Solders: [Commission Delegated Directive \(EU\) 2025/1802](#)
- Lead in Glass and Ceramics: [Commission Delegated Directive \(EU\) 2025/2363](#)

POPs: New Restrictions (Dechlorane Plus, PFOS) & Proposed Additions

The European Commission has introduced a series of significant amendments to **the Persistent Organic Pollutants (POPs) Regulation (EU) 2019/1021**, tightening controls on existing substances and proposing the addition of new hazardous chemicals to Annex I.

Dechlorane Plus Restriction

On September 25, 2025, **Regulation (EU) 2025/1930** amended the POPs Regulation to include Dechlorane Plus and its isomers, imposing a phased ban on manufacture and use. Currently listed on the REACH Candidate List, Dechlorane Plus will now face strict concentration limits under POPs.

- **Until April 15, 2028:** A concentration limit of **1,000 mg/kg (0.1%)** applies to substances, mixtures, or articles.
- **From April 15, 2028:** The limit drops drastically to **1 mg/kg (0.0001%)**.

Specific time-limited exemptions have been granted for critical sectors, including aerospace and defense (until 2032) and spare parts for land-based motor vehicles (until end-of-life or 2043).

Further details on the specific timeline and exemptions can be found in the official text of [Regulation \(EU\) 2025/1930](#).

Stricter Thresholds for PFOS

Effective December 3, 2025, Delegated Regulation (EU) 2025/718 has implemented stricter controls on **perfluorooctane sulfonic acid (PFOS)** and its derivatives. The amendment lowers the permissible unintentional trace contamination limits to align with existing standards for PFOA:

- **PFOS and salts:** Maximum **0.025 mg/kg (0.0000025% w/w)**.
- **PFOS-related compounds:** Maximum **1 mg/kg (0.0001% w/w)** for the sum of all compounds.

The regulation also removes the exemption for mist suppressants in hard chromium plating. Compliance Data eXchange (CDX) has already updated its EU POPs module to reflect these revised thresholds.

Full details are available in the official [Delegated Regulation \(EU\) 2025/718](#).

Proposed Additions: Chlorpyrifos, MCCPs, and Long-Chain PFCAs

On November 21, 2025, the Commission published three Draft Delegated Regulations proposing to add **chlorpyrifos**, **medium-chain chlorinated paraffins (MCCPs)**, and **long-chain perfluorocarboxylic acids (C9 - C21 PFCAs)** to Annex I. This move aligns EU law with recent decisions from the Stockholm Convention's 12th Conference of the Parties.

- **Chlorpyrifos:** Already banned in the EU since 2020; this listing formalizes the prohibition under the POPs framework.

- **MCCPs:** Currently a REACH SVHC; new rules will impose near-total bans with specific exemptions for aerospace and medical devices.
- **Long-Chain PFCAs:** Extends comprehensive bans across the C9–C21 range, complementing existing restrictions on PFOA.

The public consultation for these drafts closed on December 19, 2025, with formal adoption expected in **Q2 2026**.

United Kingdom

UK REACH: HSE Consults on Adding 3 Substances to Authorisation List

The UK Health and Safety Executive (HSE) has launched a consultation on its 2025 draft recommendation to add three Substances of Very High Concern (SVHCs) to **Annex 14** of UK REACH (the Authorisation List). Inclusion in Annex 14 would mean that, after a specified "sunset date," these substances can only be used or placed on the market in Great Britain if a specific authorisation is granted.

Proposed substances

The three substances recommended for inclusion are all classified as **toxic to reproduction** under the GB Mandatory Classification and Labelling list:

1. **NOTE** (2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate) - Primarily used as an organotin heat stabilizer in PVC manufacturing.
2. **Reaction mass of NOTE and MOTE** - A multi-constituent substance also used as a heat stabilizer in plastics and dry PVC blends.
3. **Tetraethyllead** - Historically used as an anti-knock agent in leaded gasoline.

Notably, these substances have already been added to the **EU REACH Authorisation List (Annex XIV)**, with a sunset date of **May 1, 2025** for EU operators. This proposal marks a move to align the UK framework with restrictions that are already nearing enforcement across the European Union.

Call for evidence

In addition to the draft recommendation, the HSE is seeking GB-specific information on two further substances to inform future prioritization:

- Reaction products of **1,3,4-thiadiazolidine-2,5-dithione**, formaldehyde and 4-heptylphenol, branched and linear (RP-HP).
- **4,4'-bis(dimethylamino)-4''-(methylamino)trityl alcohol** (containing ≥ 0.1% Michler's ketone or Michler's base).

Stakeholders are encouraged to provide data on uses, supply chains, and potential impacts to support the HSE's final recommendation. Further details on the consultation are available via the [HSE bulletin](#).

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.

Newsletter has been obtained in collaboration with



Best regards,

Your CDX Team



Contact us: cdx-info@dxs.com