



Regulatory Update Q2/2026

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 Q2 2026, 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@dxc.com.

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Global & Strategic Updates

CMRT 6.6 and EMRT 2.11 Available in CDX

The Responsible Minerals Initiative (RMI) has released CMRT version 6.6 and EMRT version 2.11, both of which are now available in the CMD and EMD modules in CDX.

The updated templates introduce targeted adjustments intended to improve data consistency and reduce recurring reporting issues observed in previous versions. While no fundamental changes to the scope of reporting have been introduced, the updates support more accurate and reliable supply chain disclosures.

- CMRT 6.6 focuses on technical refinements and clarifications that help streamline reporting on smelters and refiners, validation status, and supplier responses. The changes are designed to address common data quality challenges and support alignment with established conflict minerals due diligence expectations.
- EMRT 2.11 includes minor structural and usability improvements to facilitate reporting on extended minerals, including cobalt and mica. The update supports clearer documentation of due diligence processes and supplier engagement, while maintaining consistency across reporting sections.

Companies are expected to use [CMRT 6.6](#) and [EMRT 2.11](#) for all new submissions and to update internal reporting processes accordingly. Supplier communications should be reviewed to ensure older template versions are phased out and that information submitted through CDX reflects the latest formats. The release of these updated templates supports ongoing responsible sourcing efforts and helps ensure continuity and comparability of supply chain data across reporting cycles.

PPWR August 2026: Substance Requirements and What Has Changed in CDX

The EU Packaging and Packaging Waste Regulation (PPWR, Regulation EU 2025/40) entered into force on 11 February 2025 and applies across all EU Member States from 12 August 2026. It replaces the previous Packaging and Packaging Waste Directive with a directly applicable set of requirements, meaning it does not need to be transposed into national law.

In CDX, the regulation list for PPWR is now available under the name "Packaging and Packaging Waste Regulation". The previous Directive list will be deactivated on 12 August 2026. The current list covers the four restricted heavy metals (Lead, Chromium (VI), Mercury, and Cadmium compounds) at a combined concentration limit of 100 mg/kg. PFAS and BPA restrictions, which apply to food contact packaging, are not included by default but can be added upon request.

From 12 August 2026, PPWR also introduces a new Declaration of Conformity requirement for packaging placed on the EU market. Compliance data managed in CDX can support the preparation of this document.

For full details on substance requirements, CDX list changes, and what to do next, read the full article: [PPWR August 2026: Substance Requirements and What Has Changed in CDX](#)

Industry updates

Heavy Equipment Declarable Substances List (HEDSL)

As of May 19, 2026, the latest version of the **Heavy Equipment Declarable Substance List (HEDSL) Version 4.0** is available in CDX and ready for use.

HEDSL is a globally recognized reference list of chemical substances of concern for the non-road (heavy) equipment industry. Maintained annually by the HEDSL Committee under AEM (Association of Equipment Manufacturers), it serves as a single point of reference for manufacturers navigating chemical reporting and restriction requirements - helping to reduce administrative costs and eliminate confusion across the supply chain.

With Version 4.0 now live, CDX users can align their substance declarations with the most current and comprehensive version of the list. In addition to the updated substances, the AEM HEDSL Website also offers a Full Material Declaration (FMD) position paper and supporting guidance materials.

Access HEDSL V4.0 and all related resources on the [AEM HEDSL Website](#).

IAEG AD-PFAS Version 2.0

As of May 19, 2026, **Version 2.0 of the IAEG Per- and Polyfluorinated Alkyl Substances List (AD-PFAS)** is available in CDX and ready for use.

The AD-PFAS is a reference list of per- and polyfluorinated alkyl substances (PFAS) developed by the International Aerospace Environmental Group (IAEG) for the aerospace and defense industry and its supply chain. It serves as a single point of reference for identifying PFAS substances that may be present in A&D products or in materials used for their maintenance, repair, and overhaul, supporting consistent and accurate substance reporting across the supply chain.

Version 2.0 introduces IAEG numbers for all listed substances to support precise identification, adds four newly identified fluorinated polymer compounds, and removes three substances: Polyvinyl fluoride (PVF), 1-bromo-1,1-difluoroethane, and carbon tetrafluoride, which were determined to no longer meet the general PFAS definition.

Access AD-PFAS V2.0 and all related resources on the [IAEG website](#).

RISL updated to May 2026 - now live in CDX

The Rail Industry Substance List (RISL) has been updated to version 20 May 2026 and is now available in the CDX platform. The list covers prohibited and declarable substances for the railway sector across multiple jurisdictions including the European Economic Area, United Kingdom, Canada, the United States, Australia and Switzerland. Rail suppliers and manufacturers are encouraged to review the latest version to ensure their substance declarations remain current.

Read the full article on the [CDX Updates page](#).

North America

US Federal: EPA Further Delays TSCA PFAS Reporting Submission Period

The U.S. Environmental Protection Agency (EPA) has taken final action to further postpone the start of the PFAS reporting submission period under **TSCA Section 8(a)(7)**.

In a **final rule published on 13 April 2026**, EPA moved the opening of the submission window from **13 April 2026 to 31 January 2027**, or **60 days after the effective date of EPA's forthcoming final rule addressing proposed substantive revisions**, whichever is earlier.

EPA clarified that the April 2026 action is limited strictly to **adjusting the reporting timeline**. It does not finalise any of the substantive elements previously proposed, including potential exemptions, changes to the scope or methodology of reporting, or the proposed exemption for imported articles. The

agency also confirmed that the **duration of the reporting period** remains unresolved and will be addressed in a subsequent final rule.

Although no reporting submissions are currently required, EPA's decision confirms that PFAS reporting obligations remain forthcoming rather than withdrawn. Companies that had been preparing for an April 2026 reporting start should adjust internal timelines accordingly and continue preparatory compliance activities while monitoring EPA's next rulemaking for final decisions on scope, exemptions, and procedural requirements.

Source: [WTO TBT Notification - US EPA Final Measure on TSCA PFAS Reporting Delay, April 2026](#)

US Federal: EPA Opens Consultation on Draft TSCA Risk Assessments

In April 2026, the U.S. Environmental Protection Agency (EPA) published **draft TSCA risk assessments** for two substances: **HHCB**, a synthetic fragrance ingredient, and **phthalic anhydride**, a chemical intermediate widely used in industrial applications. The publication initiates a public consultation phase under the Toxic Substances Control Act.

EPA's draft findings indicate **divergent preliminary outcomes** for the two substances.

- For HHCB, which is commonly used in detergents, cleaners, and air fresheners, EPA does not preliminarily identify unreasonable risks under the evaluated conditions of use.
- For phthalic anhydride, however, EPA's draft assessment points to **potential unreasonable risks to human health**, primarily linked to specific occupational and consumer exposure scenarios.

The consultation is intended to gather technical and scientific input on exposure assumptions, hazard characterization, and methodological approaches used in the assessments. Stakeholders with manufacturing, import, or downstream use interests are encouraged to review the draft evaluations and provide comments, particularly where use patterns, exposure data, or risk assumptions may not reflect current practices.

The consultation period is open **until 15 June 2026**. Following review of submitted comments and scientific peer input, EPA will finalise the risk evaluations. Where unreasonable risk is confirmed in a final assessment, TSCA requires EPA to proceed to risk management measures in a subsequent regulatory step.

Source: [WTO TBT Notification - US EPA Notice on Draft TSCA Risk Evaluations for HHCB and Phthalic Anhydride, Federal Register, April 2026](#).

California Proposition 65: Notice of Intent to List

The California Office of Environmental Health Hazard Assessment (OEHHA) has issued a Notice of Intent to list three substances as known to the State of California to cause cancer under **Proposition 65** (Safe Drinking Water and Toxic Enforcement Act of 1986).

The proposed listing is being advanced under the **Labor Code mechanism**, which applies where substances have been identified as carcinogens by the International Agency for Research on Cancer (IARC). Under this mechanism, OEHHA's role is ministerial - the listing does not require an independent hazard assessment, and public comments are limited to whether IARC has sufficiently identified the specific substances as human or animal carcinogens.

The three substances proposed for listing are:

- **Hydrochlorothiazide** - a thiazide diuretic widely used in the treatment of hypertension and fluid retention, and present as an active pharmaceutical ingredient in a range of medicinal products
- **Voriconazole** - a broad-spectrum antifungal agent used in the treatment of serious fungal infections
- **Tacrolimus** - an immunosuppressant used in organ transplantation and in topical formulations for certain skin conditions

For manufacturers and suppliers, the practical significance of a Proposition 65 listing is that products sold in California which expose consumers or workers to a listed substance above the applicable No Significant Risk Level (NSRL) must carry a warning. This obligation applies regardless of where the product is manufactured.

Public comments must be received by OEHHA no later than **8 June 2026** and should be submitted electronically via oehha.ca.gov/comments.

Source: [OEHHA Proposition 65 Notice of Intent](#).

California Proposition 65: OEHHA to Hold Pre-Rulemaking Workshop on 30 July

OEHHA will host a pre-rulemaking workshop on 30 July 2026 (10:00-11:30 a.m. PST) to discuss potential amendments to Proposition 65 regulations. Draft regulatory text will be published before the workshop. For companies selling products in California, this is an early opportunity to monitor where warning requirements and compliance approaches may be headed. Participation is available in person in Sacramento or online via Zoom.

Read the full article on the [CDX News page](#).

Source: [OEHHA, Proposition 65 Omnibus 2026 Pre-Rulemaking Notice](#)

Minnesota: Minnesota Extends Initial PFAS Product Reporting Deadline

On **15 April 2026**, the Minnesota Pollution Control Agency (MPCA) announced a further extension of the initial reporting deadline under Minnesota's PFAS-in-products requirements, adopted pursuant to **Amara's Law** (Minn. Stat. 116.943). Manufacturers now have until **15 September 2026** to submit their initial PFAS product reports through the **PFAS Reporting Information System for Manufacturers (PRISM)**.

The extension applies to manufacturers of products containing **intentionally added PFAS** that are sold, offered for sale, or distributed in Minnesota, including products sold exclusively through online channels. The previous deadline had been set for **1 July 2026**.

MPCA indicated that the additional time is intended to address practical challenges raised by manufacturers, particularly difficulties in collecting PFAS data across complex supply chains and in navigating the new PRISM reporting platform. Since the system's launch, MPCA has continued to refine reporting guidance and expand support resources to improve data quality and consistency.

Manufacturers that determine they will still be unable to meet the revised September deadline may request a **single 90-day extension**, which would move the reporting deadline to **14 December 2026**. Requests must be submitted using MPCA's extension and waiver forms and must be **postmarked by 16 August 2026**.

The reporting obligation remains extensive despite the extended timeline. Required disclosures include product descriptions, the identity and function of PFAS intentionally added to each product or

component, concentration information, and manufacturer contact details. Most reported information, excluding approved trade secrets, will become publicly accessible following MPCA's review.

MPCA has emphasised that this timing adjustment does not alter the broader policy direction under Amara's Law. Existing product restrictions adopted in 2025 remain in force, and Minnesota is moving toward a comprehensive ban on products containing intentionally added PFAS by **2032**, subject to limited statutory exemptions.

Source: [Minnesota Pollution Control Agency - PFAS in Products Reporting Update, April 2026](#)

Minnesota: PRISM Training Resources Now Available

To support manufacturers in meeting their reporting obligations, MPCA has released three instructional videos covering key PRISM functions, including account creation, user management, and report submission. The videos are available on [YouTube](#), alongside the [PRISM user guide](#) and a supplemental guide covering various reporting scenarios. Additional videos are expected to be published later this spring.

For technical issues within PRISM, contact prism@theIC2.org. For questions on reporting requirements, contact pfasreporting.mPCA@state.mn.us.

Companies placing products on the Minnesota market should use the additional time to finalise internal data collection, align supplier reporting arrangements, and become fully familiar with PRISM ahead of the new deadline.

Source: [Minnesota Pollution Control Agency - PFAS in Products Reporting Update, April 2026](#)

Canada: Introduces Permit Requirement for Certain POPs Chemicals Under CEPA

Canada is progressing with the implementation of its international obligations under the Stockholm Convention through amendments to Schedule 1 of the Canadian Environmental Protection Act. From July 2026, companies that import or use products, including formulations or articles containing certain listed persistent organic pollutants, will generally be required to obtain a time-limited permit from Environment and Climate Change Canada in order to continue those activities. Permits will be granted for one year and may be renewed twice, allowing continued use for up to three years where no authorised exemption applies. Uses that fall within exemptions already established under CEPA may continue without applying for a permit or notifying authorities. The substances covered include PFOS and PFOA, long-chain PFCAs, HBCD, PBDEs including decaBDE, as well as Dechlorane Plus™ and decabromodiphenyl ethane. Companies placing products on the Canadian market should assess whether their activities fall within the new permit framework ahead of the July 2026 compliance date.

Source: [Canadian Environmental Protection Act Schedule 1 POPs amendments by Environment and Climate Change Canada](#)

Canada: CEPA Schedule 1 - Hexanoic acid, 2-ethyl-, 2-ethylhexyl ester

Environment and Climate Change Canada (ECCC) and Health Canada have added Hexanoic acid, 2-ethyl-, 2-ethylhexyl ester (2-Ethylhexyl 2-Ethylhexanoate) to Schedule 1 of the Canadian Environmental Protection Act (CEPA) - the List of Toxic Substances under Canadian federal law.

CEPA Schedule 1 identifies substances formally designated as toxic under Section 64 of the Act, posing a risk to human health, the environment, or both. A Schedule 1 listing obligates the responsible authorities to implement appropriate risk management measures applicable to manufacturers, importers, and users of the substance.

Hexanoic acid, 2-ethyl-, 2-ethylhexyl ester functions primarily as a plasticizer and processing aid. It may be present in polymer formulations, coatings, adhesives, and lubricant systems across a wide range of manufactured articles and industrial materials. Manufacturers and suppliers placing products on the Canadian market should verify whether their articles or mixtures fall within the scope of the measures associated with this listing and ensure that substance declarations accurately reflect the current regulatory status.

Source: [CEPA Registry maintained by Environment and Climate Change Canada](#).

CDX Update: As of May 7, 2026, the updated CEPA Schedule 1 entry is now active in CDX. Users are encouraged to review and update their substance declarations accordingly.

Canada: Final Watch List Approach Published Under CEPA

In April 2026, the Government of Canada published the final Watch List Approach under the Canadian Environmental Protection Act, 1999 (CEPA). The Watch List was introduced through amendments to CEPA that came into force on 13 June 2023, when the Strengthening the Environmental Protection for a Healthier Canada Act (S.C. 2023, c. 12) added the new section 75.1 to CEPA.

The Watch List identifies substances that the Minister of the Environment and the Minister of Health have reason to suspect may become toxic in the future, or that have been determined to be capable of becoming toxic. The April 2026 document establishes the formal rules for how substances will be added to or removed from the list.

The Watch List does not impose any new obligations or restrictions on substances. However, it serves as an early warning signal: substances on the list may later be added to Schedule 1 of CEPA if they are determined to be toxic, which would trigger regulatory action. For companies operating in Canada, the Watch List is a practical tool to monitor which substances may be subject to future restrictions.

Source: [Government of Canada, CEPA Registry, April 2026](#)

Read the full article on the [CDX News page](#).

European Union: Products, Packaging & Trade

Batteries: EU Launches Consultation on New Battery Removability Exemptions

On **28 April 2026**, the European Commission launched a public consultation on a draft delegated act that would introduce **additional exemptions** from the EU Batteries Regulation requirements on the removability and replaceability of portable batteries.

Under Regulation EU 2023/1542, portable batteries in products placed on the EU market must generally be removable and replaceable by end users, with the objective of extending product lifetimes and improving waste battery collection. The draft delegated act proposes to expand the list of products for which batteries would only need to be removable and replaceable by independent professionals, primarily for safety and technical reasons. Newly proposed exemption categories include wearable devices such as smartwatches and fitness trackers, certain electric toys, wireless food contact thermometer probes, products used in explosive atmospheres covered by the ATEX Directive, on-body drug delivery systems, and specific telematics devices used in agricultural and construction machinery.

The initiative follows a technical assessment process launched in 2025 and aims to balance consumer reparability, product safety, and waste management risks, including increasing fire incidents linked to improperly handled small lithium-ion batteries.

The consultation is open to stakeholders until **26 May 2026**, after which the Commission will finalise the delegated act and update its guidance to help manufacturers apply the new derogations consistently.

Source: [European Commission draft Delegated Regulation supplementing Regulation EU 2023/1542 on derogations for the removability and replaceability of portable batteries](#)

Deforestation: EUDR Where Things Stand in May 2026

Two years after the EUDR entered into force, the regulation looks noticeably different from what was originally adopted in May 2023. The **entry into application** has been pushed back twice and it now stands at **30 December 2026** for large and medium-sized companies, and **30 June 2027** for micro and small enterprises. A notable exception applies to micro and small companies already covered by the EU Timber Regulation, which must still comply by **30 December 2026**. The Commission has framed these extensions as time bought for simplification, not delay for its own sake, and the April 2026 package suggests that framing is at least partially justified.

The Structural Shift in Due Diligence

The most consequential change is not a date but a structural one. Under the revised framework adopted in December 2025, the full weight of **due diligence** now sits with the **upstream operator**, meaning the first party placing a relevant product on the EU market. Everyone else in the supply chain has had their obligations scaled back substantially.

Downstream operators, meaning companies placing a regulated product on the market that is manufactured from another regulated product, are no longer required to conduct their own due diligence assessment. Their obligation is now limited to passively collecting **Due Diligence Statement (DDS)** reference numbers from their direct suppliers. If those numbers are never provided, the downstream operator can reasonably presume there is nothing to collect. Similarly, **non-SME traders (distributors, resellers)** need only register in the Information System and retain basic contact information about their suppliers.

There is, however, one crucial exception: if a downstream operator or trader becomes aware of a **"substantiated concern"** regarding non-compliance in their supply chain, they must immediately inform the competent authorities and verify the risk before proceeding. Ultimately, this is a meaningful shift for the majority of industrial companies who interact with regulated supply chains at arm's length rather than at the point of origin.

Country Risk Classification and Simplified Due Diligence

Not all operators face the same level of due diligence burden. The Commission classifies countries and sub-national regions as **low, standard, or high risk**, based primarily on deforestation and forest degradation rates drawn from FAO Global Forest Resources Assessment data, supplemented by governance indicators. Operators sourcing exclusively from countries classified as **low risk** qualify for **simplified due diligence** under Article 13. They are still required to collect the information set out in Article 9 and to assess supply chain complexity and circumvention risk, but they are not required to complete the full risk assessment and risk mitigation steps under Articles 10 and 11.

The current list of classified countries is set out in [Commission Implementing Regulation \(EU\) 2025/1093](#). Operators sourcing from both low-risk and standard-risk countries within the same supply chain cannot apply the simplification across the board. It applies only to the portion of supply confirmed

to originate entirely in a low-risk country or region. Where no classification has been assigned, a country is treated as standard risk by default.

What the Draft Delegated Act Proposes to Change in the Product Scope

In parallel with the April 2026 report, the Commission published a **draft Delegated Act amending Annex I** - the list of products that actually triggers EUDR obligations. A **four-week feedback window ran from 4 May to 1 June 2026** on the Commission's Better Regulation ["Have Your Say" portal](#), and the act is not yet in force. Until it is formally adopted, the current Annex I continues to apply.

Several of the proposed changes matter significantly for industrial supply chains. **Cattle leather** across all processing stages is proposed for removal. For **retreaded tyres**, the scope is narrowed down precisely: only the new rubber tread added during the retreading process remains covered, while the carcass and casing fall out of scope entirely. This distinction is critical for any company incorporating retreaded tyres into its sustainability or circular economy programs. On the additions side, selected food and chemical products, such as **soluble coffee, palm oil derivatives, and frozen cattle tongues**, are proposed for inclusion to ensure comprehensive coverage of regulated commodities.

Crucially, the draft act introduces **horizontal exemptions** for samples and testing materials consumed or destroyed in the process, transport packaging, waste and second-hand goods, and marketing materials. For aerospace and automotive companies, where qualification batches and material samples are routinely exchanged, this testing exemption finally provides a clear legal basis that was missing before.

Another clarification with broad practical relevance is the addition of the prefix **"ex"** to numerous Annex I entries. This means a product is only in scope if it is actually made from the regulated natural commodity. Tyres manufactured entirely from synthetic rubber are not covered. For automotive and heavy equipment supply chains, where synthetic materials frequently appear alongside natural ones, confirming the material composition of a component is the first and most important step in assessing whether an EUDR obligation arises at all.

Where Companies Typically Run Into Difficulty

The regulation's interaction with industrial and manufacturing supply chains is one of the areas where misunderstandings are most common. The finished vehicle, electrical device, or aircraft is not listed in Annex I. That much is clear. The difficulty lies one step earlier in the components and materials that go into those products.

Take tyres as a practical example. A vehicle manufacturer importing **natural rubber tyres** directly from outside the EU is an **operator** for those tyres. It does not matter whether the tyres are destined for resale or for internal production use. The obligation to submit a Due Diligence Statement attaches to the moment the product is placed under the customs **release-for-free-circulation** procedure. A manufacturer sourcing the same tyres from a European supplier who has already completed due diligence is in an entirely different position. It is a **downstream operator**, with no assessment requirement of its own.

What Comes Next

IT System and Registration Timeline

The **EUDR Information System** is the central IT platform through which operators submit Due Diligence Statements, and downstream operators and non-SME traders register their participation in regulated supply chains. It was taken offline in late 2025 to integrate the changes introduced by the December amendment, and is expected to reopen in June 2026 for testing and validation, followed by

full production use. Every non-SME company that falls under the regulation must be registered in the system **before 30 December 2026**. Registration cannot be left until the final weeks before the deadline.

Reporting and Regulatory Convergence

Beyond registration, **operators are required to review their due diligence system at least once a year** and to **retain all records for five years** from the date of last placing on the market. Large and medium-sized companies will additionally be required to **publish an annual report** describing their due diligence activities under Article 12(3). The first reports, covering the year 2027, must be published after 30 December 2027. Companies already reporting under CSRD or CSDDD may integrate this into their existing reporting cycle rather than treating it as a separate obligation.

It is also worth noting that **the due diligence system built for EUDR can serve multiple compliance purposes simultaneously**. The Forced Labour Regulation (FLR), which applies from 14 December 2027, prohibits placing products made with forced labour on the EU market and applies to all economic operators in scope of the EUDR. The Corporate Sustainability Due Diligence Directive (CSDDD), which applies from 26 July 2029, establishes a broader horizontal framework for large companies. Where the EUDR's specific rules conflict with CSDDD's general requirements, EUDR prevails as *lex specialis*. Companies building their traceability and due diligence infrastructure for EUDR now are therefore laying the groundwork for both frameworks at the same time.

Source:

1. [Report from the Commission to the Council and Parliament on the EUDR \(April 2026\)](#)
2. [Guidance Document for the Regulation on Deforestation-Free Products \(2026\)](#)
3. [Frequently Asked Questions - Implementation of the EU Deforestation Regulation \(Version 5, April 2026\)](#)

Digital Product Passport: First Technical Standards Published

On 27 May 2026, CEN and CENELEC published six technical standards for the Digital Product Passport (DPP) under the joint technical committee CEN-CLC/JTC 24, in response to Standardisation Request M/604. The standards support the Ecodesign for Sustainable Products Regulation (ESPR, Regulation EU 2024/1781) and cover data exchange protocols (EN 18216), unique identifiers (EN 18219), data carriers (EN 18220), data storage and persistence (EN 18221), APIs for passport lifecycle management (EN 18222), and system interoperability (EN 18223).

Once the standards are cited in the Official Journal of the EU, companies applying them will have a presumption of conformity with ESPR requirements. Note that the standards are not yet available for purchase. National standardisation bodies have six months from 27 May 2026 to implement them at national level, meaning they will become available through bodies such as PKN around November 2026.

Two further standards covering access rights management (FprEN 18239) and data authentication and integrity (FprEN 18246) are expected in September 2026.

Read the full article on [the CDX News page](#).

ESPR: Commission consults on Delegated Act for iron and steel products

The European Commission published a Call for Evidence on 19 May 2026 for a planned Delegated Act under ESPR covering iron and steel products. The measures under consideration include mandatory carbon footprint and recycled content information requirements, minimum environmental performance

thresholds, and digital product passport obligations for the full supply chain. Iron and steel are the first intermediate products prioritised in the ESPR 2025-2030 working plan. A delegated regulation is expected in Q4 2026. Stakeholders can submit feedback until 12 August 2026.

Read the full article on the [CDX News page](#).

EU Batteries Regulation: Simplifications Agreed Under Omnibus VIII

The EU Council agreed its negotiating position on the Omnibus VIII package on 24 June 2026, introducing targeted amendments to the EU Batteries Regulation (EU) 2023/1542. Key changes include: a clarified producer definition covering all sales channels (not only distance contracts); a new formal definition of "substance of very high concern" aligned with REACH and CLP; updated labelling rules requiring disclosure of SVHC substances at $\geq 0.1\%$ w/w; and a shift in LMT battery pack removability requirements from cell level to module level, replaceable by independent professionals. An 18-month postponement applies to certain product categories. The Commission's mandatory four-yearly reporting obligation on battery waste management data has also been removed in favour of a more flexible approach.

Source: [EU Council Press Release, 24 June 2026](#)

Read the full article on the [CDX News page](#).

PPWR: Industry Calls for Clarifications as August 2026 Deadline Approaches

On 29 April 2026, more than 100 companies from the food, beverage, and packaging sectors sent a joint letter to the European Commission asking for postponement of the PFAS restriction under Article 5(5) and a review of several other key provisions, including recyclability requirements, recycled content targets, reuse targets, and sorting label rules. The companies argued that essential technical guidance is still missing and that complying with the regulation from 12 August 2026 creates legal uncertainty.

On 13 May 2026, more than 150 organisations responded with a counter-letter, asking the Commission to keep the August 2026 date and stating that the PPWR is the result of a proper EU legislative process that should not be reopened.

As of June 2026, the Commission has not signaled any overall postponement. Guidance documents have been published, but several technical questions remain open. Companies that produce, import, or use packaging in the EU should review their obligations under the PPWR now and monitor Commission publications closely in the coming weeks.

Read the full article on the [CDX News page](#).

Germany: PPWR National Implementation Back on Track

In May 2026, the European Commission raised concerns about Germany's draft Packaging Implementation Act (VerpackDG), which is Germany's national law to support the EU Packaging and Packaging Waste Regulation (PPWR, Regulation EU 2025/40).

On 18 May 2026, the Commission issued a detailed opinion under the TRIS procedure. The main issues were certain definitions and rules around the producer register that the Commission considered inconsistent with the PPWR. This automatically extended the standstill period to 17 August 2026, which would have delayed the VerpackDG beyond the PPWR application date of 12 August 2026.

Germany submitted written clarifications explaining that the disputed definitions covered only non-harmonised areas and that the differing reporting rules were temporary. The Commission accepted these arguments and withdrew its opinion on 29 May 2026. The Bundestag passed the VerpackDG on 11 June 2026. Bundesrat approval is still needed before the law can take effect on 12 August 2026.

Sources: [bundesumweltministerium.de](https://www.bundesumweltministerium.de)

Read the full article on the [CDX News page](#).

New EU rules for end-of-life vehicles formally adopted

The EU Council formally adopted the regulation on circularity requirements for vehicle design and end-of-life vehicle management on 29 June 2026. New vehicles will need to meet recycled plastic content targets, producers become responsible for the full vehicle lifecycle under extended producer responsibility rules, and the export of non-roadworthy used vehicles is banned. New traceability measures also address the issue of illegally dismantled or exported vehicles. The regulation will apply two years after entry into force.

Source: [Council of the EU Press Release, 29 June 2026](#)

Read the full article on the [CDX News page](#).

European Union: Chemicals & Restricted Substances

Commission confirms no REACH revision in the near future

Speaking before the European Parliament's ENVI Committee on 27 April 2026, Commissioner Roswall confirmed that the Commission has decided not to open a full revision of the REACH Regulation at this point. Instead, the focus will be on simplification through existing tools such as comitology, and on strengthening enforcement against non-compliant products at EU borders and through improved market surveillance.

Further details are expected later in 2026.

Read the full article on the [CDX News page](#).

Council and Parliament reach deal on new ECHA regulation

On 30 June 2026, the EU Council and Parliament agreed on a new standalone legal framework for the European Chemicals Agency (ECHA). The agreement decouples ECHA from the 2006 REACH regulation, consolidates its expanded mandate covering REACH, product safety and emerging substances such as PFAS, merges three budgets into one, establishes a reserve fund to manage fee revenue fluctuations, and introduces clear conflict of interest rules to protect the agency's independence. Both Parliament and Member States will be able to request scientific opinions from ECHA directly.

Source: [Council of the EU Press Release, 30 June 2026](#)

Read the full article on the [CDX News page](#).

REACH Annex XVII: Entry 83 (2,4-Dinitrotoluene)

The latest amendment to **Entry 83 of REACH Annex XVII** introduces updated restrictions on **2,4-Dinitrotoluene (2,4-DNT)**, which is a chemical intermediate classified as a Substance of Very High Concern (SVHC) due to its carcinogenic, mutagenic, and reprotoxic (CMR) properties.

2,4-DNT is primarily used in the production of **toluene diisocyanate (TDI)**, which is a core building block of polyurethane materials widely present across industrial supply chains, including flexible foams, structural adhesives, sealants, and coatings. The amendment clarifies concentration limits and tightens the scope of restrictions applicable to mixtures and articles containing 2,4-DNT placed on the EU market.

Although 2,4-DNT is an industrial intermediate rather than a substance deliberately added to finished products, its presence in supply chains is often indirect. It is most often found in polyurethane-based materials used in interior applications, insulation, seating, encapsulants, and adhesive systems across a broad range of manufactured goods.

Manufacturers and suppliers placing articles or mixtures on the EU market should verify whether their products fall within the scope of Entry 83 as amended, and ensure that Full Material Declarations (FMD) received from suppliers accurately reflect compliance with the revised thresholds.

CDX Update: The amended Entry 83 is now active in CDX. Users are encouraged to review and update their substance declarations accordingly.

Source: [ECHA REACH Annex XVII register](#).

REACH Annex XVII: Proposed Restriction on Terphenyl, Hydrogenated (PHT)

The European Commission has published a draft regulation proposing to add a new entry to **Annex XVII of REACH** restricting the use and placing on the market of **Terphenyl, hydrogenated (PHT)** (CAS 61788-32-7).

PHT, commonly referred to as Partly Hydrogenated Terphenyl, was added to the REACH Candidate List of Substances of Very High Concern (SVHC) in June 2018 due to **very persistent and very bioaccumulative (vPvB)** properties. Approximately 90% of that volume is used as a heat transfer fluid (HTF) at industrial sites, with the remaining 10% used as a plasticiser in articles and mixtures, and as a processing solvent. As a vPvB substance, PHT accumulates continuously in the environment and in living organisms. Any emissions, even at low levels, are considered a proxy for risk, as there is no concentration threshold below which exposure can be considered safe.

The proposed restriction prohibits the placing on the market and use of PHT as a substance on its own, and as a constituent of other substances, in mixtures or in articles, at a concentration of **0.1% w/w or more**.

The following uses are exempt from the restriction:

- **Industrial heat transfer fluid:** PHT used as HTF in the temperature range of 250 C to 350 C at industrial sites operating strictly controlled closed systems (SCCS) with documented technical containment and organisational measures remains permitted on a permanent basis, as no non-regrettable substitutes are currently available
- **Defence applications:** a permanent derogation applies, reflecting the EU's defence preparedness priorities

- **Civilian aerospace applications:** the restriction applies after a **10-year transitional period**, acknowledging the lengthy certification and recertification processes required in the aviation sector
- **Articles and mixtures already placed on the EU market** before 18 months after entry into force are also exempt

The regulation is proposed for adoption in the fourth quarter of 2026, with entry into force 20 days after publication in the Official Journal of the EU. The general restriction will apply **18 months** after entry into force, with the exception of civilian aerospace applications where the 10-year transitional period applies.

Compliance Implications

PHT is present as a plasticiser in a broad range of articles including cables, automotive parts, aircraft components, electrical and electronic equipment, and construction materials, as well as in sealants, adhesives, paints, inks, and encapsulants. Manufacturers and suppliers in these sectors should assess whether PHT is present in their products or supply chain at concentrations of 0.1% w/w or above, and review Full Material Declarations (FMD) in CDX accordingly ahead of the 18-month implementation deadline.

Source: [WTO TBT notification G/TBT/N/EU/1205](#).

PFAS Restriction: SEAC Consultation Closed

The 60-day public consultation on ECHA's Committee for Socio-Economic Analysis (SEAC) draft opinion on the proposed PFAS restriction closed on 25 May 2026, drawing over 3,500 comments from more than 3,200 organisations and 250 individuals across dozens of countries.

SEAC is now working through submissions before adopting its final opinion, which is the last major scientific hurdle before the European Commission takes over and formally proposes a restriction to EU Member States via the REACH Committee. For businesses using PFAS in any form, from electronics and semiconductors to lubricants, medical devices, textiles, and construction products, this is the moment to track closely. The final opinion is expected by late 2026, after which the regulatory clock starts ticking in earnest.

Source: [ECHA press release, Helsinki, 3 June 2026](#)

Read the full article on the [CDX News page](#).

ECHA Enforcement Forum Announces REF - 16 Project on Hazardous Substances in Products

On 3 June 2026, ECHA's Enforcement Forum agreed that its next EU-wide enforcement project, REF-16, will focus on whether products and mixtures placed on the EU market comply with restrictions on hazardous substances under EU chemicals legislation, in particular the restrictions listed in REACH Annex XVII. Inspections are planned for 2028, with results reported in 2029.

A key focus of REF-16 will be online sales. Inspectors will check products sold through online marketplaces, cross-border e-commerce platforms, company websites, and digital storefronts operated by distributors. The Enforcement Forum will also work with the European Commission and national authorities to explore how inspection results from online sales can support enforcement under the Digital Services Act.

Source: [ECHA, Forum enforcement projects](#)

Read the full article on the [CDX News page](#).

United Kingdom

UK POPs: New Prohibitions Proposed

The United Kingdom's Department for Environment, Food and Rural Affairs (DEFRA) has published a proposal to amend the UK Persistent Organic Pollutants (POPs) Regulation through the **Persistent Organic Pollutants (Amendment) Regulations 2026**. The proposal has been formally notified to the WTO TBT Committee with reference [GBR/119](#).

The amendment adds five substances to Annex I of the UK POPs Regulation - the list of substances subject to prohibition. Once in force, the manufacture, use, and placing on the UK market of products containing these substances will be prohibited, subject to time-limited exemptions. Unintentional trace contaminant (UTC) concentration limits will be established for each substance. The existing UTC limit for PFOS will also be revised.

The five substances newly entering the scope of the UK POPs prohibition are:

- **UV-328** (CAS 25973-55-1): a benzotriazole UV stabiliser used in plastics, coatings, and rubber
- **Dechlorane Plus** and its syn- and anti-isomers (CAS 13560-89-9, 135821-03-3, 135821-74-8): a chlorinated flame retardant used in wire and cable insulation, electrical connectors, and roofing materials
- **Medium-chain chlorinated paraffins (MCCPs)** (CAS 85535-85-9 and others): plasticisers and flame retardants used in plastics, rubber, and metalworking fluids
- **Long-chain perfluorocarboxylic acids (LC-PFCAs)**, their salts and related compounds: a class of PFAS used in fluoropolymer processing and surface treatments
- **Chlorpyrifos** (CAS 2921-88-2): an organophosphate insecticide

The regulation is proposed for adoption on **14 October 2026**, with entry into force on **16 December 2026**. Comments may be submitted to TBTEnquiriesUK@trade.gov.uk until **28 June 2026**.

Manufacturers and suppliers placing products on the UK market should determine whether any of the five substances above are present in their articles or materials. This is particularly relevant for products incorporating flame retardants, UV stabilisers, chlorinated plasticisers, or fluorinated surface treatments. Full Material Declarations (FMD) and substance disclosures in CDX should be reviewed and updated ahead of the December 2026 implementation date.

Source: [WTO TBT notification GBR/119](#).

UK REACH: 15 New SVHCs on the UK REACH Candidate List

On 15 June 2026, HSE officially added 15 substances and substance groups of very high concern (SVHCs) to the UK REACH Candidate List, following a six-week external consultation process. All newly listed substances were previously included on the EU REACH Candidate List, though this update covers only a selected subset, reflecting the independent regulatory trajectory of UK REACH since Brexit.

Inclusion on the Candidate List triggers immediate legal obligations under UK REACH. Suppliers of articles and mixtures are required to communicate information on SVHCs, notify substances present in

articles where applicable, and fulfill general communication duties along the supply chain. Companies should review their product portfolios to assess whether any of the newly listed substances are present above the 0.1% w/w threshold.

HSE has confirmed that further consultations on additional SVHCs are planned for the remainder of the 2026 to 2027 work year. Companies operating in the UK market are encouraged to monitor these developments closely.

For the full list of newly added substances and further guidance, read the full article: [UK REACH Candidate List Updated in CDX](#).

Source: [UK REACH Candidate List](#) and [HSE's SVHC overview](#) page.

This newsletter has been prepared in collaboration with



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.

Best regards,

Your CDX Team



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