

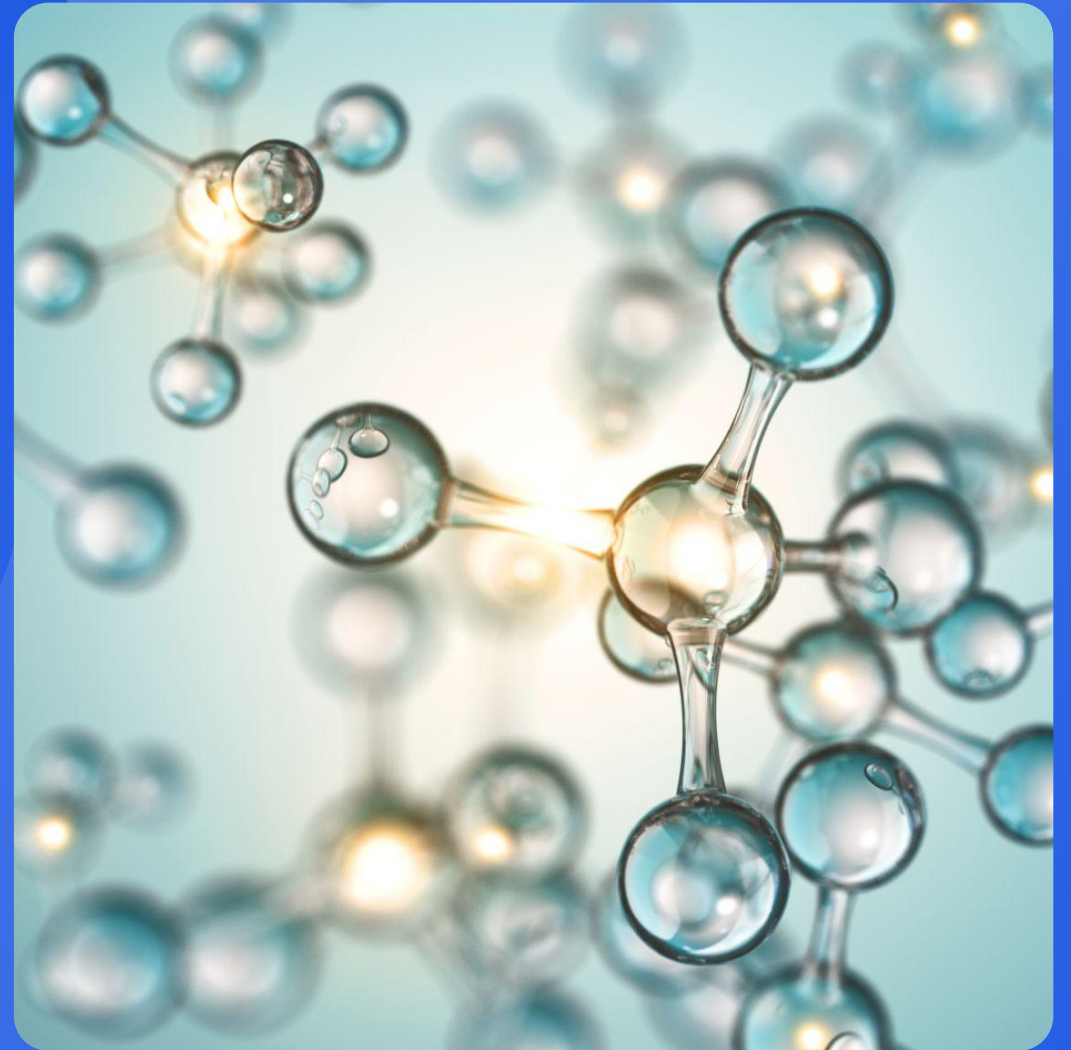


Compliance & Risks

Webinar

Chemicals Quarterly ***Q4 2024 Regulatory Update***

15 January, 2025



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Meet the Team



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Mission Statement

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Agenda

- 01. South America**
- 02. North America**
- 03. Australia/NZ**
- 04. Asia**
- 05. Europe**





South America



Law No. 15022 Enacted

Brazil's "REACH"

- Production or import threshold = one tonne per year over three years
- Information required for registration
 - Identification of producer/importer
 - Annual production/import quantities
 - CAS or IUPAC identification of substance
 - Hazard classification
 - Recommended uses

Plastic Food Contact Update

MERCOSUR Updates list of substances authorized for use

- Tetramethyl bisphenol F diglycidyl ether (TMBPF-DGE), in dispersions of macromolecular substances in water for coating of beverage cans
- Polyamide-imide 2 (PAI-2), as a binding agent for high temperature resistant coatings on kitchen utensils

Chile Lists Hazardous Substances

List of industrial hazardous substances for 2024 reporting published

- Chemical Substances Notification Platform
<https://plataformasqi.mma.gob.cl/>
- **Next round:** August 30th deadline for non-industrial substances





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North America



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Mexico Moves to Ban Asbestos

- Complete ban on import and export
 - **Includes raw materials and manufactured products**
- Reporting for companies certified to handle asbestos
- Possible permits for substitute materials and products from Cofepris



Endangered and Threatened Species

United States' EPA latest actions

- Protecting Salmon from N-(1,3-Dimethylbutyl)-N'-phenyl-p-phenylenediamine (6PPD) and 6PPD-quinone
 - **Comments due:** After 60 days (Docket EPA-HQ-OPPT-2024-0403)
- Antimicrobial Pesticide Guidance
 - Comment period closed January 1st (Docket EPA-HQ-OPP-2023-0281)

Proposed Definition of VOCs for CAA

New VOC exemption

- (Z)-1-chloro-2,3,3,3-tetrafluoropropene (CAS number 111512-60-8)
- Also known as HCFO-1224yd(Z)
- Docket EPA-HQ-OAR-2023-0295

Comments closed: January 13, 2025



PFAS Updates

United States

- 100 additional PFAS proposed for TRI
 - 100-pound reporting threshold also proposed
- TSCA Test Order for 6:2 FTAc
 - 3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl prop-2-enoate
 - 6:2 fluorotelomer acrylate
 - Issued to: Innovative Chemical Technologies, The Chemours Company, Daikin America, Inc., Sumitomo Corporation of Americas, and E.I. Du Pont de Nemours and Company

Health and Safety Reporting Rule Update

United States

Effective date: January 17, 2025

- 4,4-Methylene bis(2-chloraniline)
- 4-tert-octylphenol(4-(1,1,3,3-Tetramethylbutyl)-phenol)
- Acetaldehyde
- Acrylonitrile
- Benzenamine
- Benzene
- Bisphenol A
- Ethylbenzene
- Naphthalene
- Vinyl Chloride
- Styrene
- Tribromomethane (Bromoform)
- Triglycidyl isocyanurate
- Hydrogen fluoride
- 6PPD
- 6PPD-quinone

New Chemical Procedural Regulations

United States

- EPA approval required before manufacturing new chemicals or using for significantly new uses
- Information requirements clarified for Pre-Manufacture Notices (PMNs) and Significant New Use Notices (SNUNs)
- Designates PFAS and certain persistent, bioaccumulative, and toxic (PBT) chemicals ineligible for low volume exemptions (LVEs) and low release and exposure exemptions (LoREXs)
- **Effective date:** January 17, 2025

TSCA Rules, cont.

EPA finalizes rules for chemicals

- Trichloroethylene (TCE) and Perchloroethylene (PCE)
 - **Effective date:** January 17, 2025
- Carbon tetrachloride (CTC) rule
 - **Effective date:** January 17, 2025
- Decabromodiphenyl Ether and Phenol, Isopropylated Phosphate (3:1) revision
 - **Effective date:** January 21, 2025

Significant New Use Rules

- Significant New Use Rule adding entries to §§ 721.11863 through 721.11893, including:
 - **1,2-Ethanediamine, N-(1-methylethyl)-N-[2-[(1-methylethyl)amino]ethyl]-**
 - **Fatty acids, polymers with substituted carbomonocycles, dialkanolamine, alkyl substituted alkanediamine and halo-substituted heteromonocycle, formates (salts) (generic)**
- **Effective date:** February 10, 2025



Proposed Significant New Use Rules

United States

Proposed amendment to add Group 24-1.F substances, including:

- Polyolefin polyamine succinimide, carbopolycycle alkoxyated (generic)
- Carbon monocyclic alkene polymer with alkyl alkenoate, alkyl alkenoate, alkyl alkenoate and polyalkyldiene alkenoate (generic)
- 1-Tetradecene, homopolymer, hydrogenated, by-products from, C28-42 fraction
- Carbonic acid, ester, polymer with alkanediol (C=4,5) (generic)

Comments closed: December 30, 2024.

Proposed Significant New Use Rules, cont.

United States

Proposed amendment to add 24–2.5e substances, including:

- Polyester polyol (generic)
- 2,4,8,10-Tetraoxa-3,9-diphoshaspiro[5.5]undecane, 3,9-bis-[2-(1-methyl-1-phenylethyl)-4-(1,1,3,3-tetramethylbutyl)phenoxy]-
- 1-Propanamine, 3-methoxy-N,Ndimethyl-
- Soybean oil, mixed esters with diethylene glycol, phthalic acid and terephthalic acid

Comments closed: January 2, 2025.

Proposed Significant New Use Rules, cont.

United States

Proposed amendment to add 24–3.5e substances, including:

- Heptane, 2-methoxy-2-methyl-
- Benzenesulfonic acid, alkyl-, compd with 1,1'-iminobis[2-propanol] (1:1) (generic)
- Sugars, polymer with alkanetriamine (generic)
- Isooctadecanamide, N,N-bis(2-ethylhexyl)-
- 2-Butanone, oxime, reaction products with trimethoxymethylsilane

Comments close: January 16, 2025.

New TSCA Risk Evaluations Available

- 1,4-Dioxane; Supplement to the Risk Evaluation and Revised Unreasonable Risk Determination
- More info: Contact Cindy Wheeler at Dioxane.TSCA@epa.gov or the TSCA-Hotline at TSCA-Hotline@epa.gov



New Requirements in Effect

California

- R-2019-01 lists a new Priority Product
 - Laundry detergents containing NPEs
 - **Effective date:** October 1, 2024
- Warnings required for BPS
 - **Effective date:** December 29, 2024
- Short-form warning changes under Prop 65
 - **Effective date:** January 1, 2025
- OEHHA requests information regarding N-methyl-N-formylhydrazine
 - **Submissions closed:** January 10, 2025

Timeline

Maine's Proposed Chapter 90 Rule

- Cleaning products
- Cookware
- Cosmetic products
- Dental floss
- Juvenile products
- Menstruation products
- Textile articles (certain exclusions)
- Ski wax
- Upholstered furniture

January 1, 2026

- All other products not already prohibited (except those subject to the 2040 prohibition and used products)

January 1, 2032

- Carpets and rugs
- Fabric treatments

January 1, 2023

- Artificial turf
- Outdoor apparel for severe wet conditions (unless accompanied by a disclosure label)

January 1, 2029

- Cooling, heating, ventilation, air conditioning, or refrigeration equipment
- Refrigerants, foams, or aerosol propellants (except those used for servicing equipment and listed as acceptable by the EPA's Significant New Alternatives Program)

January 1, 2040

Toxic Free Kids Act: Effective January 2025

Oregon

Addition of ten chemicals to HPCCCCH:

- Di-(2-methoxyethyl) phthalate (DMEP)
- Tris (2,3-dibromopropyl) phosphate (TDBPP)
- Tri-n-butyl phosphate (TNBP)
- Dipentyl phthalate (DPP)
- Perfluorooctanoic acid and related substances (PFOA)
- Tricresyl phosphate (TCP)
- Bis (2-ethylhexyl) tetrabromophthalate (TBPH)
- Bis(chloromethyl)propane-1,3-diyl tetrakis-(2-chloroethyl) bis(phosphate) (V6)
- Isopropylated triphenyl phosphate (IPTPP)
- Decabromodiphenyl ethane (DBDPE)

Draft Report Identifying Priority Products

Cycle 2 Phase 2 of Safer Products for Washington

- 6PPD: Artificial turf
- Benzene, ethyl benzene, toluene, and xylene: Nail products
- Cadmium and cadmium compounds: Jewelry and accessories
- Cyclic volatile methylsiloxanes (cVMS): Cosmetics
- Formaldehyde releasers: Cleaning and household care products
- Lead and lead compounds: Jewelry and accessories
- Organobromine/organochlorine: Plastic packaging; Deodorizers
- Organohalogen flame retardants (OFRs): Insulation
- Ortho-phthalates: Cleaning/household care; Sealants, caulks and adhesives
- PFAS: Architectural Paints; Artificial turf

New Authorizations in Canada

For Manufacture and Import

- Ministerial Condition No. 21964:
1-propanaminium,
N-(3-aminopropyl)-2-hydroxy-N,N-dime
thyl-3-sulfo-, N-(C12-18 and
C18-unsatd. acyl) derivs., inner salts
 - **Effective date:** 9 October 2024
- Ministerial Condition No. 21985
octanamide, N-hydroxy-
 - **Effective date:** 13 November 2024

Potential Obligations

- Notification at least 120 days prior to commencement of activity
- Recordkeeping
- Written confirmation of transfer of the substance
- Detailed flow charts in the notification
- Disposal of substance
- Notification of environmental release
- Handling of substance

Domestic Substances List

Canada

- Notice of Intent to add significant new activity requirements for malachite green, basic violet 3, basic violet 4 and basic blue 7
 - **Comments closed:** 4 January 2025
- Order 2024-87-22-01 (**published** 29 November)
- Order 2024-87-09-01 & Order 2024-112-09-01 (**published** 2 December)
- Order 2025-66-01-01 (**published** 5 December)
- Order 2025-87-01-01 & Order 2025-112-01-01 (**published** 6 December)

Significant New Activities

- **Notice No. 21849:**
 - Iron potassium oxide (CAS 12022-41-2)
- **Notice No. 21862:**
 - Phosphoric acid, mixed decyl and octyl esters, potassium salts (CAS 70879-47-9)



Plans for Implementation

Canadian Environmental Protection Act, 1999

Comment period ended December 2024

- Draft Implementation Framework for the Right to a Healthy Environment under CEPA
- Plan of Priorities
- Watch List Approach

Additional proposal regarding vertebrate animal testing, comments closed in November



Australia/New Zealand



Australia IChEMS Decisions

- **Schedule 3:**
 - Lauryl (dodecyl) sulfates
 - Linear alkylbenzene sulfonates
- **Schedule 7:**
 - Hexachlorobenzene
 - Polychlorinated biphenyls (PCBs)
 - Polychlorinated terphenyls (PCTs)





Asia



Armenia Bans Mercury Products

6 Month Ban on products containing mercury starting 16 February

Products include:

- mercury lamps, and
- non-electronic mercury measuring devices

Comments due: 23 November 2024

China Expands Chemical Catalogue

New substances added to the Catalogue of Existing Chemical Substances include:

- | | |
|--|--|
| <ul style="list-style-type: none">• Alkenyl oxy alkyl N-[(alkenyl oxy alkoxy amide);• [(Hydroxy-polyalkoxyaryl)alkylene]aliphatic dicarboxylic acid dialkyl ester;• Hydroxymethyl heteropolycycle and hydroxy heteropolycycle;• Fatty acids, with di(hydroxyalkyl)amine and alkene oxide;• Alkyl multisubstituted benzoate;• Bis[[[(diphenyl-heteroaryl)-substituted phenoxy]ethyl] dodecanedioate; | <ul style="list-style-type: none">• Alkyl diisocyanate;• Polyalkylpyrrolidinium, salt with polyhalogeno-[(polyhalogenoalkyl)sulfonyl] alkanesulfonamide;• Methanaminium, trialkyl-, dialkylalkanoate;• Alkyl pyrrolidone;• Aluminum and nickel oxides;• Cesium tetrafluoroaluminate; etc. |
|--|--|

China Drafts Chemicals Safety Law

Aims to improve chemicals safety throughout lifecycle.

Proposed:

- employee training
- electronic tracking
- labeling requirements
- prohibition of chemicals with undetermined hazards

Comments due: 23 January 2025.

FCM Approvals in China

Expanded Usage Additives:

- C.I. Pigment black 7: Carbon black
- Sodium hydroxide
- Dibutyl sebacate
- 2,4,8,10-Tetraoxa-3,9-diphoshaspiro

New Resins: Copolymer of trimethoxyphenylsilane, methyltrimethoxysilane, and silica.

Expanded Usage Resins: Benzene, ethenyl-, polymer with 1,3-butadiene, hydrogenated.

Hong Kong Draft HFC Ban

Ozone Layer Protection (Amendment) Bill 2024:

- Implements amendment to the Montreal protocol
- Issues controls on 18 HFCs and their products
- Provides for the safe handling of substitutes



Japan Proposes Chemical Labeling

Would require:

- containers or packages of chemical substances to be labeled
- SDS for substances being transferring or provided

Proposed effective date: April 2027

Jordan Drafts Chemical Labeling

Labeling for all chemical substances to include:

- Chemical name
- Identification number
- Country of origin
- Hazard symbols
- Hazard Statement
- Analytical statement
- Recommended exposure control actions

Proposed effective date: 1 June 2025

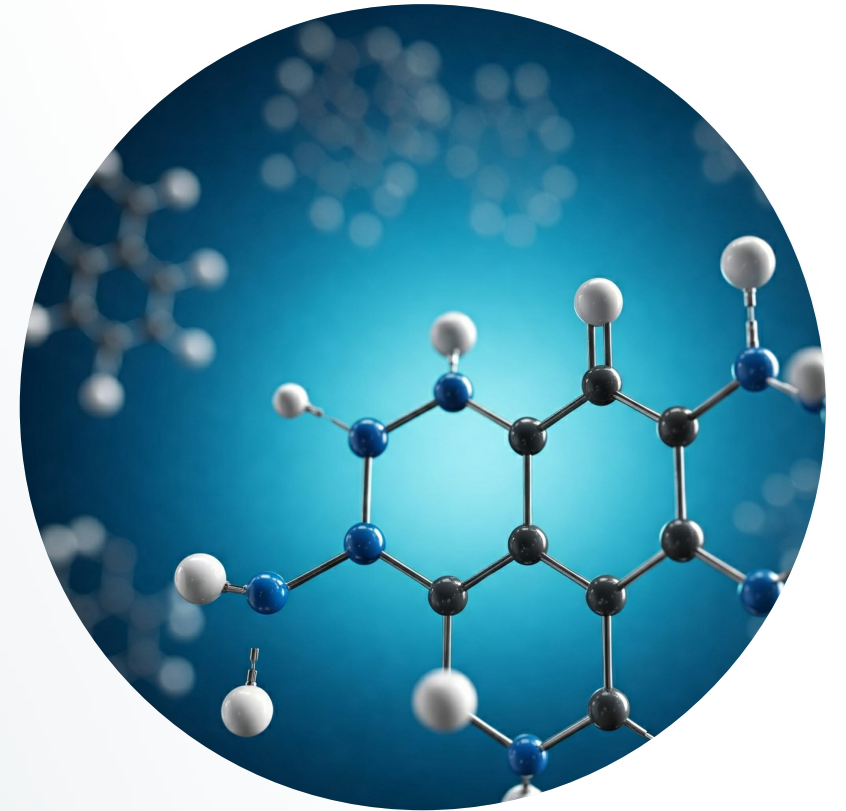
Singapore Bans Dechlorane & UV-328

Dechlorane Plus, Methoxychlor and UV-328 prohibited in Singapore.

Exemptions include:

- Medical devices
- Aerospace
- Replacement parts
- Adhesives
- Fillers
- Plastics
- Photographic paper

Effective date: 26 February 2025



Singapore Limits Formaldehyde in Paints

Interior paints with $\geq 0.01\%$ of formaldehyde are prohibited.

Exterior paints with $\geq 0.01\%$ of formaldehyde to meet labelling requirements that must:

- contain the words:

“This paint contains formaldehyde. For application on outdoor areas or for industrial use only. Do not apply on indoor areas.”

- conform to the following dimensions:
 - Containers up to 3 litres: at least 52×74 mm.
 - Containers over 3 litres: at least 74×105 mm.
 - Containers over 50 litres: at least 105×148 mm.
 - Containers over 500 litres: at least 148×210 mm.

Effective date: 1 January 2026



South Korea Chemicals in EEE

KATS establishes KS for certain chemicals in electrotechnical products:

- **KSC IEC 62321-3-3** Screening of PBB, PBDE, phthalates in Polymers
- **KSC IEC 62321-3-4** Screening of Phthalates in Polymers
- **KSC IEC 62321-11** Analysis of TCEP in Plastics
- **KSC IEC 62321-12** Simultaneous Quantification of PBB, PBDE, and 4 phthalates in Polymers

Effective date: 20 December 2024



Taiwan Proposes PFOS/PFOA limits

Draft adds:

- 5 perfluorooctane sulfonic acid (PFOS)
- 352 perfluorooctanoic acid (PFOA)

Proposed limit of nonylphenol and polyethylene glycol ether:

- Level reduced from 5% to 0.1%
- Isomers and their CAS numbers
- Expanded prohibitions to the manufacture of detergents for:
 - Industrial use
 - Textile or leather products
 - Metal
 - Manufacture of pulp or paper

Comment deadline: 20 November 2024.

Thailand to Update Hazardous Substance List

Proposals for List 5.1 on the List of Hazardous Substances under the Hazardous Substance Act:

- Dechlorane plus
- Syn-Dechlorane plus
- Anti-Dechlorane plus
- UV-328

Comments due: 16 December 2024.



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Europe



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EU CLP Revision Approved

- Online stores to display hazards
- Simplified labeling
- Ads to include chemical hazards
- Rules for safe sale of household chemicals at refill stations
- Substance inventory for SMEs
- Complex substance classification rules
- Detailed information for poison centers

Effective Date: 10 December 2024



Triphenyl Phosphate in EU REACH

Triphenyl phosphate identified as a substance of very high concern meeting the criteria under Article 57 of REACH.

Effective date: 7 November 2024.



EU PFAS Update

Consultation Input:

- Supports ongoing updates and improvements to PFAS information
- Identifies additional uses: sealing, technical textiles, printing, medical packaging

Alternative Restriction Options for:

- Batteries
- Fuel cells
- Electrolysers

Switzerland Restricts D4, D5, & D6

Approved amendment to restrict:

- Octamethylcyclotetrasiloxane (D4),
- Decamethylcyclopentasiloxane (D5), and
- Dodécaméthylcyclohexasiloxane (D6)

Exemptions:

- Medical devices
- Silicone polymers $\leq 0.2\%$.
- Professional/commercial uses
- fabric and leather cleaning

Transitional Periods:

- cosmetics (7 June 2027)
- medicinal products (7 June 2031)
- chemical products (7 June 2026)

Effective date: 1 January 2025.

Switzerland Drafts Update to ORRChem

Aim for alignment with international agreements. Key amendments:

- New annexes on: plastics, wood-based objects, and insulating gases
- Prohibitions on Dechlorane Plus and UV-328
- Clarifications on ozone-depleting substance authorizations
- Repeal of transitional labeling provisions
- New rules for air-stable substances
- Expanded PFAS restrictions - PFOA, PFOS, and PFHxS

Proposed effective date: 1 December 2025

UK Proposed POPs Amendment

Annex 1: Add Dieldrin, Methoxychlor, and UV-328, establish limits of:

- Hexachlorobenzene to ≤ 10 mg/kg
- Pentachlorophenol to ≤ 5 mg/kg

Annex 4 (waste management substances):

- Pentachlorophenol and its salts and esters
- Perfluorooctanoic acid (PFOA)
- Dicofof
- Perfluorohexane sulfonic acid

Annex 5: Expanded table of wastes and operations

Questions?



Lets Talk



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