



Q1 2025

Regulatory Updates/Quarterly Report

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2 BLUECIRCLE ADVISORS

Our mission is to help you make safer products, build ethical supply chains, and protect your company's revenues by meeting global regulatory requirements, so that you can sell your products anywhere and at any time. We provide answers to your biggest compliance challenges and connect you with the right training, tools, and teams to make product compliance part of your everyday business.

The BCA Advantage!

- Compliance experts with more than 20 years in the compliance industry
- Managed solutions for building compliance programs, collecting data from suppliers, and training
- Consulting retainers for immediate answers to your compliance challenges
- Compliance training – live, online, on-site, webinars, and seminars
- World class data collection partners
- Ability to use API software to transfer supplier data from our system to yours
- Affiliations with industry associations to share compliance best practices

Services – How We Help

Helping you manage continuously changing regulations with industry expertise.



Gap Assessments

Review product lines, suppliers, and materials at risk and receive a go-forward compliance plan



Data Collection

Acquire material declarations, full material disclosures, and certifications for standard and custom parts



Supplier Risk Management

Identify and work with high-risk suppliers to meet compliance requirements



Regulatory Consulting

Develop risk mitigation strategies and implement compliance programs



Supplier & Manager Training

Keep team members and suppliers up-to-date on global product regulations



Due Diligence Documentation

Build documented processes, policies, and procedures meeting client and regulatory compliance

Our projects help you prevent stop shipments, fines, and fees enforced by customs. With the right subject matter expertise, we show you how to answer customer compliance questions and close that sales deal you have been working on for months!

As always, we thank you for your business!

3 EXECUTIVE SUMMARY

3.1 2025 COMES IN LIKE A LION!

This quarter we see lots of changes in the regulatory world and it's only the beginning of 2025. The biggest change is the new Trump administration and the efforts to clamp down on any new regulations. As Trump shocks the world with his intensity and no holds barred manner, countries around the world are scrambling to decide which direction will be most beneficial to their economies. Countries around the world are trying to decide how not to get on Trump's bad side, so that they may continue to trade with the United States and in some cases, still be afforded military protection.

This quarter we continue to see minimal updates to the regulations we all know and love like RoHS and REACH. Regulations for PFAS are being implemented globally. Extended Producer Responsibility for packaging and recycling are becoming mandatory. There is a spotlight on chemical databases and the risk management of toxic chemicals. ESG is slowly taking a backseat in the United States but still being implemented in the European Union, and perhaps the most interesting regulations we are now reviewing have to do with issues of national security and the various critical minerals acts.

During our live call, we will go over the report highlights and determine how each one will apply to your company and your customers. This will give us time to strategize about solutions to these challenges, as well as what types of tools, training, and documentation your company will need to be compliant.

3.2 IMPACT ON THE INDUSTRY

It all comes down to REVENUE PROTECTION. In these perilous times, it's important that companies are focusing on the regulations that are most important to facilitating sales and opening new markets. Prioritizing where financial and human capital is spent is necessary to stay in business for the long term. Understanding which regulations must be complied with and which projects are a soft win will separate the strong from the weak.

In these crucial times, mapping your supply chain and understanding which suppliers are a high-risk to your business will give your company a competitive advantage. The need to find new sourcing opportunities or at a minimum not be single sourced on a material, part, or product will keep your company ahead of the game. Qualifying suppliers that may be nearer shore could help your company in uncertain times. Where once we looked strictly for economies of scale and lower costs, now we must be laser eyed on availability and compliant products. We are living in volatile times when trade can be impacted by war, shipping constraints, and fuel costs.

At the end of this regulatory review, we will discuss ways in which your company can be prepared and ahead of the industry when meeting global compliance requirements.

4 ESG – NEW RULES OF BUSINESS

4.1 US – CALIFORNIA AB 1305 VOLUNTARY CARBON MARKET DISCLOSURES

The scope of AB 1305 is broad and will impact many companies and other organizations. The law establishes three distinct reporting categories, which apply independently of one another, and require different types of website disclosures (updated at least annually).

- [A business entity that is marketing or selling voluntary carbon offsets within the state \(§44475\)](#)

AB 1305 defines VCOs broadly to mean any product that claims to be a “greenhouse gas emissions offset,” a “voluntary emissions reduction,” a “retail offset,” or any like term, that connotes that the product “represents or corresponds to a reduction in the amount of greenhouse gases present in the atmosphere or that prevents the emission of greenhouse gases into the atmosphere that would have otherwise been emitted.” It does not include products that are sold to address legal mandates to reduce or prevent GHG emissions (including carbon offsets involved in California’s cap-and-trade program). Additionally, an advisory opinion issued by the California Attorney General’s Office clarified that the definition of VCO does not include renewable energy credits (“RECs”) issued in respect of units of electricity generated from renewable energy sources, on the basis that RECs do not claim to offset or reduce emissions.[4]

Required disclosure: Website disclosure of discrete factors regarding applicable carbon offset projects, including the location, project name, durability, whether the project uses independent third-party verification, and other information intended to enable consumers to independently assess the efficacy and status of applicable carbon offset projects. Disclosure must also include details regarding accountability measures and the information required to reproduce and verify the credits issued. (See Appendix A for full details).

- [An entity that \(i\) purchases or uses VCOs and \(ii\) makes climate-related emissions claims \(§44475.1\)](#)

The second prong of the statute applies to entities that purchase or use offsets and make certain types of claims about their emissions. The statute specifically identifies claims regarding the achievement of net zero emissions, claims relating to the entity or a product being “carbon neutral,” or other claims that imply that the entity does not add net carbon dioxide or GHG to the climate or “has made significant reductions” to its carbon dioxide or GHG emissions. Intensity-based decarbonization goals are not expressly addressed but assumed to be included.

Required disclosure: Entities must disclose six discrete factors relating to each project or program, as applicable (name, offset seller, offset registry/program, and project ID number, offset project type and other details, methodology to estimate emissions reductions/removal benefits, and whether independent third-party verification is included). (See Appendix A for full details).

- [An entity that makes climate-related emissions claims \(§44475.2\)](#)

The third and final prong of AB 1305 is the broadest and applies to entities that are not involved in the voluntary carbon market. This part of the statute applies to any entity making claims regarding the achievement of net zero emissions, claims relating to the entity or a product being “carbon neutral,” or other claims that imply that the entity does not add net carbon dioxide or GHG to the climate or “has made significant reductions” to its emissions, as above.

Required disclosure: Disclose information on the method the entity uses to substantiate claims and whether there is independent third-party verification of the company's data and claims.

The consequences of noncompliance with AB 1305's requirements (i.e., failure to disclose or inaccurate disclosure on the company's website) are penalties up to **\$2,500 a day per violation**, not to exceed \$500,000 (whether annually or in total is not specified). These penalties may be recovered in a civil action brought by a broad range of public entities, the California Attorney General and any state district attorney, county counsel or city attorney.[5]

Companies should assess now whether they may be required to make disclosure under any one or more of the statute's three independent prongs, and begin to prepare website disclosures for posting by the end of the year.

- For companies that participate in the carbon offset market, as buyers or sellers (e.g., prongs one or two), the disclosure obligation is more extensive and will likely require external and internal information-gathering to prepare initial disclosures—and potentially increased documentation requirements when securing VCOs in the future.
- For companies in scope of the third prong relating to emissions claims, the required disclosure (e., methods used to substantiate claims and whether independent third-party verification is involved) may already be available elsewhere in the company's sustainability reporting, but we recommend that companies separately consolidate, reiterate and identify these data points as corporate "AB 1305 disclosures."¹

This closely follows the EU's path for the Carbon Border Adjustment Mechanism regulation. We will continue to watch as each regulation progresses.

4.2 UK CARBON BORDER ADJUSTMENT MECHANISM (UKCBAM)

In October 2024, the U.K. government published its response to the consultation on introducing a U.K. Carbon Border Adjustment Mechanism (CBAM) and confirmed that, from January 1, 2027, the U.K. CBAM will place a carbon price on some of the most emissions-intensive industrial goods imported into the U.K., initially focusing on the aluminum, cement, fertilizer, hydrogen, iron and steel sectors. The glass and ceramic sectors will be considered for future inclusion. Sectoral scope was determined by three factors: (i) inclusion in the U.K. Emissions Trading Scheme; (ii) carbon leakage risk; and (iii) feasibility and effectiveness. precursor step to referring the matter to the Court of Justice of the European Union, which can impose financial penalties.²

The UK CBAM will place a carbon price on some of the most emissions intensive industrial goods imported to the UK from the aluminum, cement, ceramics, fertilizer, glass, hydrogen, iron and steel sectors.

¹ <https://www.stblaw.com/about-us/publications/view/2024/10/29/voluntary-carbon-market-disclosure-requirements-are-coming-what-companies-need-to-know-about-california-s-ab-1305>

² <https://www.debevoise.com/insights/publications/2024/10/10-esg-weekly-update>

Emissions Scope Included:

- Scope 1 emissions relate to direct activities owned or controlled by an organisation. These emissions are directly controlled by those producing the product, for example as part of a manufacturing process or when fuels are combusted onsite.
- Scope 2 emissions relate to an organization's consumption of purchased electricity, heat, steam and cooling. Scope 2 represents indirect emissions which are not directly controlled by manufacturers of a product.
- Scope 3 relates to other emissions released as a consequence of an organization's actions that occur at sources not owned or controlled by the organisation. Scope 3 represents indirect emissions created upstream or downstream, for example, the transportation by air of finished products by subsequent entities, or the production of precursor goods from another manufacturer in the supply chain.
- The UK CBAM will apply to Scope 1, Scope 2 and select precursor product emissions embodied in imported products to ensure comparable coverage with the UK Emissions Trading Scheme.

The UK CBAM is designed so that other countries which also have an explicit carbon price will see the CBAM liability on their goods adjusted accordingly.

The price applied by a CBAM will therefore be set based on the explicit carbon price differential between the UK and the country where the products were produced.

The government will consult in more detail on the criteria for carbon prices elsewhere in the world to be recognized by the UK CBAM.³

4.3 EU DEFORESTATION REGULATION IN EFFECT DECEMBER 2025

On October 2, 2024, the European Commission proposed postponing the implementation of the EU Deforestation Regulation by twelve months to allow stakeholders additional time to prepare for compliance.

Enacted in June 2023, the Deforestation Regulation requires extensive due diligence to ensure that certain commodities and related products admitted and traded on the EU market are not linked to deforestation, forest degradation, or violations of indigenous peoples' rights. Such commodities include soy, cattle, cocoa, coffee, palm oil, rubber, and timber. Under the Commission's revised timeline, which still requires approval from the European Parliament and European Council, the Deforestation Regulation would go into effect on December 30, 2025, for large companies and June 30, 2026, for micro- and small enterprises (instead of December 30, 2024 for large companies and December 30, 2025 for micro- and small enterprises as currently required by the Deforestation Regulation).

³ <https://www.gov.uk/government/consultations/addressing-carbon-leakage-risk-to-support-decarbonisation/outcome/factsheet-uk-carbon-border-adjustment-mechanism>

The Commission also published additional guidance documents and 40 new FAQs for impacted companies and enforcement authorities. The new guidance includes more information on penalties, traceability obligations, and product scope.⁴

5 ANTI-TRAFFICKING & FORCED LABOR ENFORCEMENT

What is human trafficking? Human trafficking involves the recruitment, transportation, or harboring of persons for the purpose of exploitation, typically in the sex industry or for forced labor.

This can include physical violence, sexual assault, and emotional abuse used to control a victim. Human trafficking can occur within a specific country or cross borders globally. Prostitution and forced servitude are two forms of trafficking. Often victims suffer when they try to escape or refuse to comply. Organized crime is often involved with trafficking.

5.1 37 ENTRIES ADDED TO UFLPA ENTITY LIST

On January 14, 2025, 37 Entities Added to UFLPA Entity List in Largest Single Expansion to Date “We have shown again through today’s enforcement actions that the United States is committed to keeping goods made with forced labor out of U.S. supply chains,” said DHS Under Secretary for Policy Robert Silvers, who serves as Chair of the FLETF. “Companies must conduct due diligence and know where their products are coming from.

The Department of Homeland Security (DHS), on behalf of the Forced Labor Enforcement Task Force (FLETF), announced the addition of 37 entities to the Uyghur Forced Labor Prevention Act (UFLPA) Entity List, marking the largest single expansion of the list to date. Among entities added are a large supplier of critical minerals and one of the world’s largest textile manufacturers, both linked to forced labor practices in the People’s Republic of China (PRC). This addition brings the total number of entities on the UFLPA Entity List to 144, representing significant progress in three years since the law was passed.

“With each addition to the UFLPA Entity List, we are building momentum and showing that our efforts are sustainable and enduring in eradicating forced labor in our nation’s supply chains,” said Acting Under Secretary for Policy, Robert Paschall. “This largest-ever batch of additions reinforces that we are implementing the full force of this law, making impactful updates to the UFLPA Entity List, and enhancing U.S. Customs and Border Protection’s enforcement capabilities.”

The entities added today include globally recognized companies that mine and process Xinjiang’s critical minerals, that grow Xinjiang cotton and manufacture textiles for global export, and that manufacture inputs for solar modules with polysilicon made in Xinjiang.

26 Entities in the Cotton Sector: The FLETF has identified Huaifu Fashion Co., Ltd. (“Huaifu”) and 25 of its subsidiaries as entities engaged in the production and sale of cotton and cotton products. Huaifu maintains a vertically integrated

⁴ <https://www.debevoise.com/insights/publications/2024/10/10-esg-weekly-update>

supply chain from cotton planting in the XUAR, processing, and yarn spinning through textiles manufacturing. Twenty-two of these subsidiaries are located in the XUAR, and three are located in Ningbo City, Zhejiang Province. This information has been corroborated by publicly available sources. Given this evidence, the FLETF determined that activities of these entities satisfy the criteria for addition to the UFLPA Entity List under Section 2(d)(2)(B)(v). The 26 entities are:

- Huafu Fashion Co., Ltd.
- Ningbo Huafu Donghao Industrial Co., Ltd.
- Ninghai Huafu Textile Co., Ltd.
- Zhejiang Weixin Trading Co., Ltd.
- Aksu Huafu Color Spinning Co., Ltd. (also known as: Aksu Huafu Textiles Co., Ltd. Akesu Huafu, Aksu Huafu Dyed Melange Yarn, and Akesu Huafu Melange Yarn Co., Ltd.)
- Aksu Biaoxin Fiber Co., Ltd. (formerly known as Aksu Shangheng Fiber Co., Ltd.)
- Xinjiang Huafu Textile Co., Ltd.
- Xinjiang Huafu Hengfeng Cotton Industry Co., Ltd.
- Kuche Zongheng Cotton Industry Co., Ltd.
- Xinjiang Huafu Hongfeng Agricultural Development Co., Ltd.
- Shaya Yinhua Cotton Industry Co., Ltd.
- Awati Huafu Textile Co., Ltd.
- Xinjiang Huafu Color Spinning Group Co., Ltd.
- Xinjiang Huafu Cotton Industry Group Co., Ltd.
- Shihezi Standard Fiber Co., Ltd.
- Shihezi Huafu Hongfeng Cotton Industry Co., Ltd.
- Shihezi Huafu Hongsheng Cotton Industry Co., Ltd.
- Xinjiang Tianhong Xinba Cotton Industry Co., Ltd. (also known as Xinjiang Tianhong New Eight Cotton Industry Co., Ltd.)
- Huyanghe Huafu Hongsheng Cotton Industry Co., Ltd.
- Xinjiang Liufu Textile Industrial Park Co., Ltd.
- Kuitun Jinfu Textile Co., Ltd.
- Xinjiang Tianfu Cotton Supply Chain Co., Ltd.
- Xinjiang Cotton Industry Group Yuepu Lake Cotton Industry Co., Ltd.
- Xinjiang Cotton Industry Group Jiashi Cotton Industry Co., Ltd.
- Xinjiang Zefu Cotton Co., Ltd.
- Xinjiang Shengfu Cotton Industry Co., Ltd.

The remaining nine companies are all green energy and solar-based products.⁵

⁵ <https://www.dhs.gov/archive/news/2025/01/14/dhs-announces-addition-37-prc-based-companies-uflpa-entity-list>

5.2 REFORM OF THE UK MODERN SLAVERY ACT OF 2015

As reported in our October issue, a House of Lords select committee published a report evaluating the impact and effectiveness of the Modern Slavery Act (MSA) 2015 following the UK Parliament's request for a review.

The committee's report, "The Modern Slavery Act 2015: becoming world-leading again", is generally critical of the existing legislation, with the committee stating that the UK's response to modern slavery "has not kept up with the advances of other nations".

The report highlights areas where the UK has fallen behind in its approach to tackling modern slavery and offers a series of recommendations for improvement, such as strengthening reporting requirements and aligning UK due-diligence laws with international standards.

The government published its response to the report on 16 December. The response does not suggest that significant substantive reform of the MSA is on the short-term priority list for the UK government. In terms of increasing transparency in supply chains, it has said that it will conduct a review of legislative and non-legislative measures to tackle forced labour and increase transparency in global supply chains, and that that will be done in "due course". The response also indicates the government is considering the scope and nature of the Section 54 reporting obligation itself, including the potential application to public sector organizations, and will provide further details on this review in the future.

In response to the committee's recommendation for import laws banning goods produced by companies known to use forced labour, which would align with the EU's Forced Labour Regulation as set out above, the government has said it will continue to assess and monitor the effectiveness of existing measures and the impact of new policy tools.

With the EU introducing the Corporate Sustainability Due Diligence Directive, the Corporate Sustainability Reporting Directive, and the EU Forced Labour Regulation, there is an opportunity for the UK to take steps to align domestic law with EU requirements that many UK companies will directly or indirectly be impacted by anyway. The response does not suggest such a substantive change is coming soon. However, businesses should keep abreast of any changes that may be introduced, particularly given the increased risk of penalties for non-compliance. ⁶

5.3 NEW UK LAW PROHIBITING SALE OF FORCE LABOR GOODS

On 12 December 2024, the new EU regulation prohibiting products made with forced labour from being sold on the Union market (the "Forced Labour Regulation") was published in the EU Official Journal, impacting businesses that sell any products into or from the EU from the end of 2027.¹

⁶ <https://www.osborneclarke.com/insights/Regulatory-Outlook-january-2025-modern-slavery>

The Forced Labour Regulation is the latest in a suite of laws requiring transparency and supply chain due diligence for economic operators in the EU.

Things to know about the law, and steps companies can take now to prepare for its application.

1. A ban on all products made with forced labour

The Forced Labour Regulation prohibits:

- economic operators ("any natural or legal person or association of persons"²)
- from placing (e.g., importing for the first time) and making available (e.g., through distance/online sales) on the Union market, or exporting from the EU,
- all products made with forced labour³ (products sold online will be covered, if the offer for sale is targeted at consumers in the EU).⁴

The prohibition applies to all products sold in the EU, including their components, regardless of geographic origin or industry.

2. ILO-aligned definition of "forced labour"

The Forced Labour Regulation aligns the definition of "forced labour" with the International Labour Organization conventions covering a wide variety of coercive labour practices, meaning "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily"⁶, or as a means of coercion, discipline or discrimination.⁷

3. Covers the entire life cycle of a product

The prohibition is concerned with the entire life cycle of the product (and its components) which will be banned if forced labour has been used at any stage of their production, manufacture, harvest or extraction, in whole or in part, including working or processing related to the product at any of those stages.

4. No "additional" due diligence but due diligence guidance to be issued

The Forced Labour Regulation itself does not impose any "additional" due diligence obligations on economic operators besides those already provided for by EU and national law.⁸ It is intended to operate alongside the existing regulations and the EU Corporate Sustainability Due Diligence Directive, which will impose mandatory due diligence.

5. Enforcement will start with risk-based investigations by competent authorities to identify potential violations

The relevant competent authority will conduct investigations to identify potential violations of the Forced Labour Regulation; prioritizing such investigations based on a risk-based approach.

6. Decisions

Where the competent authority determines that an economic operator has violated the Forced Labour Regulation, they shall "without delay" adopt a decision which contains any or all the following:

- A prohibition to place or make available the products concerned on the EU market and to export them.
- An order for the economic operator subject to the investigation to withdraw the products concerned or to remove related content promoting or listing the products online.
- An order for the economic operator to dispose of violating products

Where only parts of a product are found to be in violation, if the part is replaceable, the economic operator will be ordered to dispose of and replace any prohibited component(s), but otherwise maintain the product.

7. Consequences of non-compliance

Economic operators affected by a decision can request that it be reviewed. However, if the decision is upheld, penalties (which could include fines) will be imposed for non-compliance.

8. Timeline from 2024-2027

The Forced Labour Regulation entered into force on 13 December 2024 (one day following its publication in the EU Official Journal) and:

- Within 12 months, the Member States shall confirm their designated competent authorities to the Commission and other Member States, which will be made publicly available on the Forced Labour Single Portal;¹⁷
- Within 18 months, the Commission will publish guidelines and create the necessary non-exhaustive, evidence-based databases for its application;¹⁸ and
- After 36 months, the Forced Labour Regulation will become applicable, i.e, from Q4 2027.¹⁹

Companies must have a compliance and due diligence program implemented in order to protect future sales in the United Kingdom.⁷

⁷ <https://www.whitecase.com/insight-alert/eu-adopts-forced-labour-ban-8-things-know>

6 MINERALS AND MINING

6.1 NEW CHINA RESTRICTIONS FOR CRITICAL MINERALS

The People's Republic of China is ratcheting up efforts to deny the U.S. and its allies access to critical minerals that are essential to national defense and many commercial technologies, according to Mark Smith, Executive Chairman and CEO of Nio Corp Developments Ltd. ("Nio Corp" or the "Company") (NASDAQ:NB).

According to the [Feb. 4, 2025](#) Wall Street Journal, China implemented export restrictions of [five additional critical minerals: tungsten, tellurium, bismuth, molybdenum, and indium](#). In December 2024, China banned the export of gallium and germanium, which are vital to many electronics and defense applications, and increased export restrictions on graphene.

All minerals have applications in various defense and commercial technologies, but export blocks on other critical minerals cause much more damage to the Pentagon, according to Smith.

"With today's move, China is showing that it will not hesitate to deny the U.S. access to other critical minerals that are much more vital," Smith said. "If they start restricting U.S. access to rare earths, for example, as they did for a brief time in 2010, we are in serious trouble."

In another move aimed squarely at the Pentagon, China's Ministry of Commerce (MOFCOM) announced on January 1, 2025, the addition of 28 U.S. defense-sector companies to its Export Control List. That means that these companies, which include Raytheon, General Dynamics, Boeing, and others, may not import from China "dual use" goods and technologies that can be used in both commercial and defense systems.⁸

6.2 AUSTRALIA SECURES CRITICAL MINERALS

Australia implemented one of its most significant minerals regulations in years with its "Critical Minerals Strategy 2023-2030". The strategy also, unsurprisingly, aims to reduce the country's dependence on China.

It also emphasizes increasing the value of Australian critical minerals by processing them domestically rather than just exporting raw materials, and it includes plans to attract investment and build international collaborations to secure these ever-important critical mineral supply chains.

The Australian Government website states that China currently accounts for over 60% of REE mining, over 80% of rare earth refinement and processing, and more than 90% of rare earth magnet production. Additionally, China has major critical mineral reserves, supported by substantial state financing and loose environmental regulations. As a result, it dominates much of the critical mineral refinement and processing market.

⁸ <https://markets.financialcontent.com/stocks/article/accwirecq-2025-2-4-china-ratchets-up-export-restrictions-on-defense-critical-minerals-to-the-us>

Australia is already a strong contender in the lithium mineral market; however, its rare earth industry is less developed. Nevertheless, Australia's mineral wealth presents a strong opportunity to diversify mineral supply chains outside of China.⁹

The Australia Government states, "Australia has what it takes to compete with China, but government financing, regulatory support, and international cooperation will be essential."

6.3 CANADA SECURES CRITICAL MINERALS

Canada currently has a list of 31 minerals it considers to be "critical." The fund provides major investments in innovative projects that will help grow Canada's economy. SIF reviews the potential for each project to benefit the Canadian economy and Canadians at large when assessing the "statement of interest."

SIF is an integral part of Canada's larger critical mineral strategy, which sets out a course for the country to become a global supplier of choice for critical minerals and the clean digital technologies they enable.

The SIF has funded over 100 direct-to-business projects and ten network agreements, representing a total of over C\$8.2B in SIF contributions, with the potential to generate C\$72B in private sector investments across various sectors.¹⁰

6.4 BRAZIL SECURES CRITICAL MINERALS

Brazil is well-positioned to become a driving force in the global energy transformation. The country is home to some of the world's largest deposits of critical minerals necessary for the shift away from fossil fuels.

While Brazil already exports some of these minerals, it aims to develop domestic value chains for critical minerals, capitalizing on its leadership in renewable energy.

In February 2024, Brazil announced a US\$200M fund to support exploration and improvements in ESG practices. The fund was created in partnership with the Brazilian Development Bank (BNDES) and the Ministry of Mines and Energy, and it aims to increase local production of materials for Electric Vehicle (EV) batteries and promote ESG practices in invested companies.

The fund's goals are to support projects considered strategic to the energy transition, decarbonization, and sustainable food production.

The money can be used by small and medium sized companies to invest in facilities and projects eligible under

⁹ <https://www.theassay.com/articles/analysis/significant-recent-critical-minerals-regulations-across-the-globe/>

¹⁰ <https://www.theassay.com/articles/analysis/significant-recent-critical-minerals-regulations-across-the-globe/>

the fund's criteria but restricts the funds from being used by larger companies who already have access to capital.¹¹

7 EXTENDED PRODUCER RESPONSIBILITY

7.1 UPDATES FOR 2025

Federal Canadian Government

- First annual report to the Federal Plastics Registry is due 29 September 2025

Yukon

- Battery EPR will be implemented on 1 April 2025
- Packaging EPR will be implemented on 1 October 2025

United States

Some states prefilled EPR bills for the 2025 legislative session:

New York

- SB73 Relates to rechargeable battery recycling

Washington

- HB1107 Concerning environmental impacts of fashion, and SB5045 Expanding the state battery stewardship program to include electric vehicle batteries.

Colorado

- Packaging Producers must join a PRO by 1 July 2025

Maine

- Expected to adopt packaging EPR rules by Summer 2025

Maryland

- The Packaging EPR Advisory Council expects to receive a completed needs assessment to review, and then use to begin finalizing their EPR recommendations to the legislature, that are meant to inform future packaging EPR bills, by 1 February 2025

¹¹ <https://www.theassay.com/articles/analysis/significant-recent-critical-minerals-regulations-across-the-globe/>

Minnesota

- Packaging Producers must join a PRO by 1 July 2025

Oregon

- Packaging and paper products EPR launches on 1 July 2025 making Oregon the first state to go live with their packaging EPR program

Vermont

- Producers of rechargeable batteries and battery containing products must join a PRO by 1 June 2025. In 2025, we will see customers demand more information on EPR requirements in both the US and Europe. Data collection will become a necessary component to answering customer questionnaires.

As we move into 2025, the EPR space will be chaotic as companies will need to implement individual compliance plans by state, federal, and country.

8 EU ROHS

8.1 PACK 22 EXEMPTION RENEWALS UNDER REVIEW AGAIN

On January 13, 2025, the European Commission published draft delegated directives to revoke and renew key Restriction of Hazardous Substances (RoHS) exemptions for the use of lead in the following applications (from exemption pack 22):

- Lead as an alloying element in steel, aluminum, and copper: 6(a), 6(a)-I, 6(b), 6(b)-I, 6(b)-II, 6(c)
- Lead in high-melting temperature solder: 7(a)
- Lead in glass or ceramic: 6(a), 6(a)-I, 6(b), 6(b)-I, 6(b)-II, 6(c)

These delegated directives are now open for public consultation. The deadline for responses is February 10, 2025, four weeks after publication. During this period, industry can comment on the proposed expiry dates and proposed split of exemptions into sub exemptions.

Any company that places electrical and electronic products or parts on the European Economic Area (EEA) market, or sells them to companies that sell into the EEA, should immediately assess whether they use any of the affected exemptions, if lead is in any parts they use, and if they will need to continue using those exemptions in the future. Time is extremely limited to apply for the renewal of necessary exemptions, or to identify and source lead-free parts.

These RoHS exemption updates will have a widespread impact on global manufacturing supply chains, and the proposed regulatory timeline is significantly shorter than expected.

The latest round of proposed RoHS regulatory updates has taken compliance professionals by surprise, with very short validity periods compared to the norm.

Exemptions that are intended to be revoked, with a [phase-out period of 12–18 months](#):

- 6(a) (Lead as an alloying element in steel for machining purposes and in galvanized steel containing up to 0.35% lead by weight)
- 6(b) (Lead as an alloying element in aluminum containing up to 0.4% lead by weight)
- 6(b)-I (Lead as an alloying element in aluminum containing up to 0.4% lead by weight, provided it stems from lead-bearing aluminum scrap recycling) (for equipment categories 1–7 and 10)
- 6(b)-II (Lead as an alloying element in aluminum for machining purposes with a lead content up to 0.4% by weight) (for equipment categories 1–7 and 10)

Exemptions proposed to expire on **December 31, 2026**:

- 6(a)-I (Lead as an alloying element in steel for machining purposes containing up to 0.35% lead by weight)
- 6(a)-II (Lead as an alloying element in batch hot-dip galvanized steel components containing up to 0.2% lead by weight)
- 6(b)-I (Lead as an alloying element in aluminum containing up to 0.4% lead by weight, provided it stems from lead-bearing aluminum scrap recycling) (for equipment categories 9 IMCI and 11 only)
- 6(b)-II (Lead as an alloying element in aluminum for machining purposes with a lead content up to 0.4% by weight) (for equipment categories 9 IMCI and 11 only)
- 6(b)-III (Lead as an alloying element in aluminum casting alloys containing up to 0.3% lead by weight, provided it stems from lead-bearing aluminum scrap recycling) (new exemption)
- 6(c) (Copper alloy containing up to 4% lead by weight)
- 7(a) (Lead in high-melting-temperature type solders, i.e., lead-based alloys containing 85% by weight or more lead)
- 7(c)-I (Electrical and electronic components containing lead in a glass or ceramic other than dielectric ceramic in capacitors, e.g., piezoelectric devices, or in a glass or ceramic matrix compound)

Exemptions proposed to expire on **December 31, 2027**:

- 7(a)-I to 7(a)-VII (Very specific applications of lead in high-melting-temperature type solders, i.e., lead-based alloys containing 85% by weight or more lead, for forming stable electrical connections (new exemptions)
- 7(c)-II (Lead in dielectric ceramic in capacitors for a rated voltage of 125 V AC or 250 V DC or higher, excluding applications covered by point 7(c)-I or 7(c)-IV)
- 7(c)-V (Electrical and electronic components containing lead in a glass or glass matrix compound that fulfills five very specific functions) (new exemption)
- 7(c)-VI (Electrical and electronic components containing lead in a ceramic that fulfills any of the following functions [excluding items covered by points 7(c)-II, 7(c)-III and 7(c)-IV of this Annex as well as point 14 of Annex IV]:
 - For use in piezoelectric lead zirconium titanate [PZT] ceramics
 - For providing ceramics with a positive temperature coefficient [PTC]) (new exemption)¹²

As soon as we have a final word on the exemptions renewals, we will alert clients.

¹² <https://www.assent.com/blog/draft-expiry-dates-for-key-rohs-lead-exemptions-published/>

9 EU REACH

9.1 REACH CANDIDATE LIST UPDATED TO 247 SVHCS

On January 21, 2025, the European Chemicals Agency (ECHA) added five (5) new substances of very high concern to the Candidate list. The Candidate list now contains 247 entries that may prove potentially harmful to humans and the environment.

Complying with the regulation is critical to preventing stop shipments, fines, and fees in Europe.

Any supplier who directly or indirectly supplies parts or products to the European market has the obligation to communicate the existence of SVHCs above the concentration of 0.1% (weight over weight) in their products.

All companies selling into the European Union must collect new EU REACH Candidate compliance declarations from their suppliers and assess the risk for use of the newly listed SVHCs. If the SVHCs are found to be above the article threshold, then this must be communicated to resellers and/or distributors selling the company's products in Europe.

In addition, if the company places products directly on the European Union market and the new SVHCs are found above the allowable threshold, companies must submit their compliance information to the EU SCIP database.

All substances proposed during the September 2024 public consultation have been identified as SVHCs. Among these, tris(4-nonylphenyl, branched and linear) phosphite (TNPP) was already listed on the Candidate List in 2019 with a condition: "with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP)."

This entry is revised in the current update because the endocrine-disrupting properties of TNPP are independent of the presence of 4-NP in its composition. Therefore, the details of this entry have been updated to clarify that the substance meets the criteria based on its intrinsic properties, regardless of whether it contains $\geq 0.1\%$ w/w of 4-NP.

New SVHCs Added as of January 21, 2025:

Substance name	EC number	CAS number	Reason for inclusion	Examples of uses
6-((C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl)hexanoic acid	701-118-1	2156592-54-8	Toxic for reproduction (Article 57c)	Lubricants, greases, release products and metal working fluids
O,O,O-triphenyl phosphorothioate	209-909-9	597-82-0	Persistent, bioaccumulative and toxic, PBT (Article 57d)	Lubricants and greases
Octamethyltrisiloxane	203-497-4	107-51-7	Very persistent, very bioaccumulative, vPvB (Article 57e)	Manufacture and/or formulation of: cosmetics, personal health care products, pharmaceuticals, washing and cleaning products, coating and non-metal surface treatment and in sealants and adhesives
Perfluamine	206-420-2	338-83-0	Very persistent, very bioaccumulative, vPvB (Article 57e)	Manufacture of electrical, electronic and optical equipment and machinery and vehicles
Reaction mass of: triphenylthiophosphate and tertiary butylated phenyl derivatives	421-820-9	192268-65-8	Persistent, bioaccumulative and toxic, PBT (Article 57d)	No active registrations
Updated entry:				
Tris(4-nonylphenyl, branched and linear) phosphite	-	-	Endocrine disrupting properties (Article 57(f) - environment)	Polymers, adhesives, sealants and coatings

We expect new additions to the Candidate list in June 2025.

9.2 EU REACH REVISION SCHEDULED IN 2025

The European Union's upcoming revision of the REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals) regulation, scheduled for 2025, seeks to strengthen chemical safety by tightening restrictions on hazardous substances, particularly PFAS, reducing the need for individual authorization, and addressing critical information gaps. These changes aim to build a safer and more sustainable chemicals industry across Europe.

These anticipated regulatory changes come directly from written responses provided by Commissioner-designates Stéphane Séjourné and Jessika Roswall in advance of their upcoming hearings. Séjourné, designated to oversee Prosperity and Industrial Strategy, and Roswall, who will lead the Environment, Water Resilience, and Circular Economy portfolio, outlined their priorities for the 2025 REACH revision in response to questions from the European Parliament. Both Commissioners stressed the need to enhance chemical safety, reduce administrative burdens, and streamline regulatory processes to support public health and environmental protection.

Increasing Chemical Restrictions to Protect Health and Environment

The 2025 REACH revision places a stronger emphasis on restricting harmful chemicals across broad categories rather than relying on case-by-case authorizations. This shift means that chemicals posing high risks could face accelerated category-wide restrictions, reducing their use across the EU more efficiently. By moving away from reliance on individual authorizations, the new framework enables faster implementation of safety measures, simplifying compliance for companies while prioritizing public health and environmental protection.

The broader restrictions model also aids regulators in targeting groups of hazardous chemicals simultaneously, enhancing protection while easing compliance, especially for small and medium-sized enterprises (SMEs) that may find individual authorisation processes costly and complex.

New PFAS Restrictions and Essential Use Criteria

A central focus of the 2025 revision is tightening restrictions on PFAS (per- and polyfluoroalkyl substances), often referred to as “forever chemicals” due to their environmental persistence. The EU is moving towards a complete ban on PFAS in consumer products, including cosmetics, food packaging, and outdoor textiles. However, essential-use criteria will be introduced, allowing specific industrial applications of PFAS where no viable substitutes are available, and the chemicals are deemed critical for health or technology.

Under the new essential-use criteria, only those PFAS applications essential for sectors such as healthcare and clean technologies will be exempted from a total ban, though these will still be closely regulated and monitored. This approach aims to reduce PFAS-related health and environmental risks across the EU while ensuring continuity in critical applications where alternatives do not yet exist.

Addressing Information Gaps in Chemical Safety

The revision also prioritizes closing information gaps in chemical safety, particularly regarding the health and environmental impacts of chemicals. Enhanced data requirements will be introduced for chemicals known to be endocrine disruptors or highly persistent in the environment, allowing for more informed and preventive regulatory action. The new framework mandates better documentation and traceability of chemicals throughout the supply chain, which will increase transparency and enable regulators to make faster, data-driven decisions.

Supporting the Circular Economy and Sustainable Practices

Aligned with the Clean Industrial Deal and Circular Economy Act, the 2025 REACH updates support sustainable chemical use and a circular economy. By restricting hazardous chemicals and encouraging safer alternatives, the revisions aim to reduce dependency on virgin materials and foster resource-efficient industry practices across the EU.

The EU REACH revision will be out for public comment during 2025 and likely be in effect in 2026.¹³

10 GLOBAL MATERIAL AND CHEMICAL REGULATIONS

10.1 CHINA ROHS DRAFT IN CONSULTATIONS

On November 19, 2024, the Ministry of Industry and Information Technology (MIIT) of China [released](#) the **draft Requirements for the Restricted Use of Hazardous Substances in Electrical and Electronic Products (20231685-Q-339)** for public comment. This new mandatory Chinese national standard is intended to replace the currently effective China RoHS standard, GB/T 26572-2011, along with its amendments. Once these changes have taken place, it will establish an updated admission condition for electrical and electronic products entering the Chinese market.

The deadline for submitting comments on this draft is **January 18, 2025**.

This draft specifies the limit requirements, marking requirements, and conformity assessment requirements for hazardous substances in electrical and electronic products produced, sold, and imported in China.

The main revisions highlighted in the new draft include the addition of:

- Three terms and definitions: "environment-friendly use period," "catalogue for compliance management of restricted use of hazardous substances in electrical and electronic products," and "exception" (see 3.6, 3.7 and 3.8)
- Classification management requirements for the restricted use of hazardous substances in electrical and electronic products (see Clause 4)
- Requirements for marking the restricted use of hazardous substances in electrical and electronic products (see Clause 6)

¹³ <https://www.useforesight.io/news/2025-reach-revision-to-introduce-stricter-eu-chemical-regulations-pfas-restrictions-and-essential-use-criteria>

- Requirements related to the declaration of conformity for the restricted use of hazardous substances in electrical and electronic products (see Clause 7)
- Requirements related to inspection rules (see Clause 8)

[See the full Chinese text](#) of the draft standard, and [the official drafting explanation in Chinese](#), which addresses the context, timeline, major changes, relationship with relevant regulations and other mandatory standards, and additional background information.¹⁴

10.2 CANADA FINAL AMENDMENT FORMALDEHYDE IN WOOD PRODUCTS

To enhance environmental standards and reduce health risks, the Canadian government has announced significant amendments to the Formaldehyde Emissions from Composite Wood Products Regulations. These changes will take effect 90 days after their publication in Part II of the Canada Gazette.

These amendments were proposed following a public comment period that began in June 2023, aimed at correcting oversights in the 2021 regulations concerning the quality control testing requirements for panel manufacturers. Without correction, the oversight would have required all formaldehyde emission tests to be conducted by accredited laboratories, a requirement that was not the original intent of the policy and was seen as burdensome by industry stakeholders.

The main aspects of the revisions to the Formaldehyde Emissions from Composite Wood Products Regulations include:

1. An updated definition of "directive," specifically referring to the guidance document on formaldehyde emission testing issued by the Canadian government in June 2023.
2. A new definition of "accredited laboratory," requiring laboratories to be accredited to the international standard ISO/IEC 17025 or under environmental quality laws, with their accreditation scope including the testing of composite wood products or laminated products for formaldehyde emissions.
3. A clarified definition of production batches to facilitate quality control and compliance testing.
4. Adjusted formaldehyde emission standards for composite wood products, specifying that 90% of results in testing must be below 0.04 ppm.
5. Specified frequencies for sample selection, testing, and verification, requiring four tests per year with intervals of no less than 60 days and no more than 120 days between each test.
6. Strengthened re-testing requirements for non-compliant batches and specified time limits for notifying purchasers of non-compliance.
7. Updated requirements for the types of information that manufacturers and importers must retain and provide, including detailed records of production and sales, as well as compliance declarations to be provided to the minister.
8. Specified retention and disclosure times and locations for compliance documents, and the timeframe for providing these documents to government departments under specific circumstances.

¹⁴ <https://www.ansi.org/standards-news/all-news/2024/12/12-12-24-call-for-comments-on-chinas-new-draft-mandatory-standards>

These revisions not only reduce the administrative burden on businesses but also, by aligning with the TSCA Chapter 6 in the United States, reduce international trade barriers, benefiting Canadian manufacturers, sellers, and importers of composite wood products in the U.S. market.¹⁵

10.3 UKRAINE REACH ENFORCED JANUARY 2025

On July 23, 2024, the Ukrainian government approved the technical regulation for the safety of chemical products, known as Ukraine REACH. The full text of the regulation and the official resolution containing the registration deadlines can be accessed here. The competent authority overseeing this regulation is the Ministry of Environmental Protection and Natural Resources of Ukraine (MEPR).

Key Dates and Deadlines

Ukraine REACH will come into force on **January 26, 2025**, six months after its approval. The pre-registration process will begin on this date and will last until **January 26, 2026**.

Important Registration Deadlines:

October 1, 2026:

- Substances at $\geq 1,000$ t/a
- CMR substances (Category 1A and 1B) at ≥ 1 t/a
- Substances very toxic to aquatic organisms (acute or chronic) at ≥ 100 t/a

June 1, 2028:

- Substances at 100 – 1,000 t/a

March 1, 2030:

- Substances at 1 – 100 t/a

All 59 entries in Annex XIV on Authorization have a latest application date (LAD) of April 1, 2027, and a sunset date (SSD) of June 1, 2027.

Ukraine REACH provides the option for non-Ukrainian manufacturers and formulators to appoint an Only Representative to handle Ukraine REACH obligations. This includes pre-registration, registration, and other requirements outlined in Ukraine REACH. It is advisable to begin the selection process for an Only Representative soon, as their appointment will be necessary for the pre-registration phase starting in six months.¹⁶

10.4 SOUTH KOREA SUBSTANCE REGISTRATION AND CHEMICAL EVALUATION ACT UPDATES

The Ministry of Environment of South Korea recently submitted a notification to the World Trade Organization (WTO) regarding the revision of the Designation of Restricted Substance and Prohibited Substance. This revision aims to strengthen the restrictions on the use of lead and its compounds as well as methylene chloride and its mixtures, based

¹⁵ <https://www.chemradar.com/news/detail/e9iulcevevwg>

¹⁶ <https://www.reachlaw.fi/ukraine-reach-regulation-text-and-registration-deadlines-are-now-official/>

on the hazard assessment under the Chemical Substances Registration and Evaluation Act and international regulatory trends, to protect human health and safety. WTO member countries can comment on this revision before January 13, 2025.

Specific Revisions

- Lead and its compounds and mixtures containing more than 0.009% lead (KE NO. 06-5-8)

Restriction: The use of lead and its compounds, as well as mixtures containing more than 0.009% lead, is prohibited in the manufacture, import, sale, storage, transportation, and use in paints.

Exceptions: The manufacture, maintenance, and upkeep of aircraft and their parts, as well as related activities for military supplies, are not subject to this restriction.

New restrictions on methylene chloride and mixtures containing more than 0.1% methylene chloride (KE NO. 06-5-15)

Restriction: The use of methylene chloride and mixtures containing more than 0.1% methylene chloride is prohibited in the manufacture, import, sale, storage, transportation, and use in household cleaners, sprays, and paint removers for home, construction, and furniture.

Additionally, the notification lists the specific chemical names and CAS numbers under the unique number 06-5-8 for lead and its compounds and mixtures containing more than 0.009% lead, including:

- Lead
- C.I. Pigment red 104; Lead chromate molybdate sulfate red
- C.I. Pigment yellow 34; Lead sulfochromate yellow
- Dioxobis(stearato)trilead; Bis(octadecanoato)dioxotrilead
- Fatty acids, C16-18, lead salt
- Lead 2,4,6-trinitroresorcinoxide
- Lead 2-ethylhexanoate
- Lead acetate
- Lead acetate
- Lead azide
- Lead bis(tetrafluoroborate)
- Lead chromate (PbCrO₄)
- Lead dinitrate
- Lead monoxide
- Lead oxide (Orange lead)
- Lead oxide phosphonate
- Lead oxide sulfate
- Lead stearate
- Lead sulfate, tetrabasic
- Pentalead tetraoxide sulfate
- Other lead compounds
- Mixtures containing more than 0.009% of the above chemicals

These regulations will be implemented from [January 1, 2026](#), in accordance with the Chemical Substances Control Act. This measure aims to raise environmental standards and public health protection both domestically and internationally, reflecting South Korea's proactive stance in global chemical management.

11 GLOBAL PFAS CONCERNS (US, EU, CANADA)

PFAS BACKGROUND

The per- and polyfluorinated substances (PFAS) were previously referred to as perfluorochemicals (PFCs). PFAS are a group of chemicals used to make fluoropolymer coatings and products that resist heat, oil, stains, grease, and water. Fluoropolymer coatings can be used in such varied products as clothing, furniture, adhesives, food packaging, heat-resistant non-stick cooking surfaces, and the insulation of electrical wire. Many chemicals in this group, including perfluorooctane sulfonic acid (PFOS) and perfluorooctanoic acid (PFOA), have been a concern because they do not break down in the environment, can move through soils and contaminate drinking water sources, and they build up (bioaccumulate) in fish and wildlife. PFAS have been found in rivers and lakes and in many types of animals on land and in the water.¹⁷

PFAS have a wide range of different physical and chemical properties. They can be gases, liquids, or solid high-molecular weight polymers. They are sometimes described as long-chain and short-chain to group PFAS that may behave similarly in the environment. PFAS are also grouped into subgroups in various other ways based on their structure.

PFAS are widely used as they have unique desirable properties. For instance, they are stable under intense heat. Many of them also have surfactant properties and function, e.g., as water and grease repellents.

Some of the major industry sectors using PFAS include aerospace and defense, automotive, aviation, textiles, leather and apparel, construction and household products, electronics, firefighting, food processing, and medical articles.

Over the past decades, global manufacturers have started to substitute long-chain PFAS with shorter-chain PFAS or with non-fluorinated substances. This trend has been driven by the fact that the undesired effects of long-chain PFAS on human health and the environment were assessed and recognized first by scientists and authorities around the globe. Short-chain PFAS can also have similar or other properties of concern.¹⁸

11.1 EPA ADDS NINE PFAS TO TRI

Jan. 3, 2025 the U.S. Environmental Protection Agency announced the automatic addition of nine per- and polyfluoroalkyl substances to the list of chemicals covered by the Toxics Release Inventory.

TRI data is reported to EPA annually by facilities in designated industry sectors and federal facilities that manufacture, process, or otherwise use TRI-listed chemicals above set quantities. The data include quantities of such chemicals that were released into the environment or otherwise managed as waste. Information collected through TRI allows

¹⁷ https://www.cdc.gov/biomonitoring/PFAS_FactSheet.html

¹⁸ <https://echa.europa.eu/hot-topics/perfluoroalkyl-chemicals-pfas>

communities to learn how facilities in their area are managing listed chemicals. The data collected is available online and helps to support informed decision-making by companies, government agencies, non-governmental organizations and the public. Adding new chemicals to the TRI advances the Biden-Harris Administration's environmental justice commitments by improving accountability and transparency for families, workers, and communities across the country.

"EPA continues to make strides in getting information on PFAS into the Toxics Release Inventory so the public can see if these chemicals are being released into their communities," said Assistant Administrator for the Office of Chemical Safety and Pollution Prevention Michal Freedhoff. "People have a right to know when facilities in their backyards are releasing toxic chemicals into the environment and with today's action, we are providing important information about nine more."

These nine PFAS were added to the TRI list pursuant to the Fiscal Year 2020 National Defense Authorization Act, which provides the framework for the automatic addition of PFAS to TRI each year in response to specified EPA activities involving such PFAS. For TRI Reporting Year 2025 (reporting forms due by July 1, 2026), reporting is required for these nine additional PFAS, bringing the total PFAS subject to TRI reporting to 205.

Addition of PFAS with final toxicity values

The 2020 NDAA includes a provision that automatically adds PFAS to the TRI list upon the Agency's finalization of a toxicity value. The nine PFAS were automatically added for Reporting Year 2025 due to EPA having finalized a toxicity value during 2024 and whose identity is not claimed as confidential business information. These nine PFAS are:

- Ammonium perfluorodecanoate (PFDA NH₄) (3108-42-7)
- Sodium perfluorodecanoate (PFDA-Na) (3830-45-3)
- Perfluoro-3-methoxypropanoic acid (377-73-1)
- 6:2 Fluorotelomer sulfonate acid (27619-97-2)
- 6:2 Fluorotelomer sulfonate anion (425670-75-3)
- 6:2 Fluorotelomer sulfonate potassium salt (59587-38-1)
- 6:2 Fluorotelomer sulfonate ammonium salt (59587-39-2)
- 6:2 Fluorotelomer sulfonate sodium salt (27619-94-9)
- Acetic acid, [(γ-ω-perfluoro-C8-10-alkyl)thio] derivs., Bu esters (3030471-22-5)

Addition of PFAS no longer claimed as confidential business information.

Under NDAA section 7321(e), EPA must review CBI claims before adding a PFAS to the TRI list if the chemical identity is subject to a claim of protection from disclosure under 5 U.S.C. 552(a). EPA previously identified Acetic acid, [(γ-ω-perfluoro-C8-10-alkyl)thio] derivs., Bu esters for addition to the TRI list based on the NDAA's provision to include specific PFAS upon the NDAA's enactment. However, due to CBI claims related to its identity, this PFAS was not added to the TRI list at that time. The identity of this chemical was subsequently declassified in an update to the Toxic Substances Control Act Inventory in May 2024. Because its identity is no longer confidential, it was added to the TRI list.

As of Jan. 1, facilities that are subject to reporting requirements for these chemicals should begin tracking their activities involving these PFAS as required by Section 313 of the Emergency Planning and Community Right-to-Know Act. Reporting forms will be due by July 1, 2026.

These nine newly added PFAS, along with the previous 196 TRI-listed PFAS, are also subject to EPA's action in October 2023 to classify all PFAS subject to TRI reporting as chemicals of special concern. Among other impacts, this removes the

use of a reporting exemption that allowed facilities to avoid reporting information on PFAS when those chemicals were used in small concentrations.¹⁹

We will continue to follow the regulations progress.

11.2 TRUMP WITHDRAWS PFAS ORDERS

The Trump administration withdrew a proposed EPA rule to limit PFAS discharges into industrial wastewater, reversing efforts to regulate the toxic “forever chemicals.”

Environmental advocates like Melanie Benesh warn the decision delays critical federal standards and emboldens polluters to continue contaminating water supplies.

PFAS chemicals, linked to cancers, immune suppression, and developmental harm, affect millions of Americans through contaminated water, food, and household products. Under the Biden administration, the EPA had designated certain PFAS chemicals as hazardous substances and proposed enforceable drinking water limits to protect public health.

Trump’s withdrawal coincides with executive orders aimed at deregulating environmental protections, including withdrawing from the Paris Climate Agreement and rolling back renewable energy initiatives. Critics, including NRDC president Manish Bapna, argue that these actions prioritize corporate interests over public health and undermine U.S. climate leadership. The decision has left state regulators and environmental groups scrambling to address PFAS contamination without federal guidance.

In a stunning reversal of environmental progress, President Donald Trump’s administration has withdrawn a Biden-era proposal to limit the discharge of toxic PFAS chemicals, often referred to as “forever chemicals,” into industrial wastewater. This decision, made during the first week of Trump’s second term, represents a significant setback for public health and environmental protections, prioritizing corporate profits over the well-being of millions of Americans.²⁰

11.3 MINNESOTA PFAS LAW ENFORCED JANUARY 2025

Starting on Jan. 1, 2025, the first prohibitions of products containing intentionally added PFAS under [Amara's Law \(Minn. Stat. § 116.943\)](#) will take effect in Minnesota.

Intentionally added PFAS will be prohibited in products that fall under 11 categories:

- [carpets or rugs](#)
- [cleaning products](#)

¹⁹ <https://www.epa.gov/newsreleases/epa-adds-nine-additional-pfas-toxics-release-inventory>

²⁰ <https://www.nationofchange.org/2025/01/27/trump-administration-withdraws-proposed-pfas-regulations-giving-polluters-a-green-light/>

- [cookware](#)
- cosmetics
- [dental floss](#)
- [fabric treatments](#)
- [juvenile products](#)
- [menstruation products](#)
- textile furnishings
- ski wax
- [upholstered furniture](#)

The prohibition also applies to [certain types of packaging](#) used with the products above.

While PFAS are often found in these product categories, PFAS-free alternatives are already widely available.

The MPCA may prohibit additional products if the products contain intentionally added PFAS and are likely to harm Minnesota's environment and natural resources. Amara's Law makes no exceptions for products in these categories, nor does it provide extensions to the timeline if no PFAS alternatives are available. "Currently unavoidable use" determinations do not apply to products subject to PFAS prohibitions in 2025. [Details of currently avoidable use will be established through rulemaking.](#)

Manufacturers are responsible for maintaining awareness of regulations potentially applicable to their products, so the MPCA will not directly notify manufacturers that their products may be prohibited. However, the MPCA is conducting general outreach to educate stakeholders.

These 11 categories are in addition to prohibitions on [PFAS in firefighting foam and food packaging](#), which took effect on Jan. 1, 2024.²¹

11.4 CALIFORNIA AB1817 PFAS

Starting January 1, 2025, California's AB-1817 will prohibit the manufacture, distribution, sale, or offering for sale of any new textile articles containing regulated PFAS, with limited exceptions. "Textile articles" can refer to any textile goods customarily used in households and businesses (i.e., apparel, draperies, furnishings, bedding, backpacks, etc.). Manufacturers must remove regulated PFAS using the least toxic alternatives available to comply with this law.

Additionally, manufacturers are required to provide a certificate of compliance to sellers and distributors, certifying that their textile articles meet these standards and do not contain regulated PFAS. This legislation builds on existing provisions of [AB-1817](#), which already ban the sale or distribution of food packaging and juvenile products containing regulated PFAS. California textile manufacturers must take immediate steps to meet these requirements for the 2025 deadline.

²¹ <https://www.pca.state.mn.us/air-water-land-climate/2025-pfas-prohibitions#packaging>

We will see many states bring bills to their Senate in 2025. Most laws are aimed at consumer products. However, customer's may ask suppliers of non-consumer products to also be compliant with the new laws.²²

11.5 AUSTRALIA PFAS

Australia has also introduced regulatory measures aimed at controlling the use of PFAS, particularly those related to PFOA (perfluorooctanoic acid) and other related compounds. The Australian government has adopted a precautionary approach to regulating PFAS, focusing on preventing further contamination and ensuring compliance with international chemical safety standards.

1. **Authorization Requirements for Importers and Exporters:** Under the Australian Industrial Chemicals Introduction Scheme (AICIS), importers and exporters must obtain authorization to import or export PFOA-related compounds. This regulation ensures that PFAS-related chemicals are carefully managed and that their potential risks are assessed before they enter the market. Non-compliance with these authorization requirements may result in penalties, further emphasizing Australia's commitment to chemical safety.
2. **Focus on Compliance with Global Standards:** Australia's approach to [regulating PFAS is largely influenced](#) by international standards, with the country seeking to align its regulations with those in the European Union and the United States. This alignment ensures that Australia remains in step with global efforts to reduce the risks associated with these chemicals.²³

Australia plans to have the regulation fully implemented before the end of 2025.

11.6 CANADA PFAS

In 2024, Canada advanced PFAS regulation with updated reports and a new section 71 mandatory survey notice under the Canadian Environmental Protection Act (CEPA). Issued on July 27, the notice, titled "Notice with respect to certain per- and polyfluoroalkyl substances," requires entities that manufactured, imported, or used PFAS in 2023 to report detailed information to Environment and Climate Change Canada (ECCC) by January 29, 2025.

The updated [Risk Management Report](#) proposes a phased approach beginning with restricting PFAS not currently regulated in firefighting foams. It also proposes the class of PFAS, excluding fluoropolymers, to be recommended for addition to the List of Toxic Substances in Schedule 1 of CEPA. The Report also suggests that stakeholders explore options for phasing out PFAS in their operations, collaborate with trading partners to assess alternatives, and voluntarily disclose information on products containing PFAS to consumers.²⁴

²² <https://blog.sourceintelligence.com/pfas-regulations-how-to-remain-compliant>

²³ <https://regask.com/global-pfas-regulations-overview/>

²⁴ <https://blog.sourceintelligence.com/pfas-regulations-how-to-remain-compliant>

11.7 NEW ZEALAND PFAS

New Zealand is advancing its efforts to phase out PFAS, with the New Zealand EPA proposing a ban on PFAS ingredients in cosmetics. The phased approach begins at the end of 2025 when the updated rules take effect. [Key deadlines](#) include:

- December 31, 2026: Importing or manufacturing cosmetics with PFAS ingredients will be prohibited.
- December 31, 2027: Selling cosmetics containing PFAS ingredients will no longer be allowed.
- June 30, 2028: Any remaining cosmetic products with PFAS ingredients must be disposed of.

New Zealand will begin monitoring PFAS imports in mid-2025.

12 CALIFORNIA PROPOSITION 65

12.1 LATEST 60 DAY NOTICE OF VIOLATION – SEPTEMBER SUMMARY

The year started with a slight drop in NOV as compared to December (337 vs. 394); The first BPS NOV was issued for thermal receipt paper – these NOV will certainly increase.

As if cosmetics haven't had enough issues with Prop 65, another chemical (nitrous oxide) has cropped up in the last 2 months, being detected in various shave gels, foams, mousses. Nitrous oxide is a GRAS food additive (21 CFR 184.1545) and is commonly used in whip cream cans. It has been on the Prop 65 list since 2008, so we'll see if this keeps growing.

PFAS chemicals have been detected in a few seafood samples but had an overall drop in enforcement this month.²⁵

January 2025 Proposition 65 Notice of Violation Summary (~337)		
Number of Violations (vs. December)	Listed Chemicals	Types of Products Targeted
152/180	Heavy metals (lead, cadmium, arsenic)	Ceramic mugs/dinnerware, food items (soups, seafood, mushrooms), dietary supplements/protein powders (greens powders), brass components [~27 amendments]
92/59	Phthalates (DEHP, DINP, DBP)	Tools, pouches/bags/ purses, cases, vinyl grips (kettlebells), hoses [11 amendments]
52/103	Diethanolamine/ cocamide diethanolamine	Pomade, hand soap, cleanser, foundation, shampoo, shave gels/ creams, mascara, lotion [11 amendments]
14/13	delta-9-tetrahydrocannabinol, Marijuana smoke	Cannabis products
6/27	PFOA, PFNA, PFOS	Clams, sardines, protein matcha, burrito bowl, paper straws, dried fruit
6/4	Chromium (hexavalent compounds)	Gloves
5/3	Nitrous oxide	Cleansing foam, mousse, shave gel
3	p-Dichlorobenzene	Moth balls
3	Naphthalene	Moth balls
2	Pulegone	Mint Caffeine Pouches, mint candy
1/4	BPA	Camera case
1	BPA	Thermal receipt paper
www.prop65madesimple.com		

²⁵ www.prop65madesimple.com

Almost all California Prop65 violation notices are directed toward consumer goods. Companies that do not sell consumer products or do not produce products or maintain offices in California are at lower risk for receiving a violation. Having proper labeling and due diligence documentation will mitigate compliance violation notices and deter court fees. Unless your products contain the chemicals listed in the chart, there is minimal risk at this time.

12.2 CALIFORNIA PROPOSITION 65 - SUBSTANCE REVIEWS

Below are the latest notices for California Prop65, as of October 19, 2024.²⁶

January 17, 2025: Vinyl Acetate added to the Proposition 65 List for Cancer

Effective January 3, 2025, the Office of Environmental Health Hazard Assessment (OEHHA) has added vinyl acetate to the Proposition 65 list as a carcinogen. This listing was done via the “State’s Qualified Experts” mechanism, based on the Carcinogen Identification Committee’s (CIC) determination that this chemical was clearly shown to cause cancer.

December 24, 2024: Overview of the 2024 Meeting of the Developmental and Reproductive Toxicant Identification Committee (DARTIC)

The Developmental and Reproductive Toxicant Identification Committee (DARTIC) voted in favor of listing bisphenol S as a reproductive toxicant (male reproductive endpoint) under Proposition 65 by a vote of 9 (yes) to 0 (no). A recording of the full meeting and transcript will be posted online when available.

December 6, 2024: Proposition 65: Clear and Reasonable Warnings – Safe Harbor Methods and Content

The Office of Environmental Health Hazard Assessment (OEHHA) has amended Title 27, this regulatory action will make the Proposition 65 short-form warning more informative to consumers.

The Proposition 65 list was last updated on December 29, 2023. Below is a link to the list:

<https://oehha.ca.gov/proposition-65/proposition-65-list>

12.3 PROP65 SHORT FORM WARNING LABEL CHANGES

Under Proposition 65, manufacturers must provide clear and reasonable warnings to consumers and workers if their products can cause exposure to chemicals on the OEHHA’s list of carcinogens and reproductive toxicants. The list is updated at least once a year and currently contains over 1,000 chemicals.

Typically, this means warning labels must be applied directly to the products. Manufacturers can choose either a long-form or short-form label. Historically, most have chosen a generic short form warning label stating, “cancer and reproductive harm.” However, this has resulted in “over-use, diluting the impact of legitimate warnings... which does not

²⁶ <https://oehha.ca.gov/proposition-65> Latest Prop65 list

serve Proposition 65's purpose of providing relevant hazard information" (from the OEHHA's Initial Statement of Reasons).

To fix this issue, the new ruling requires all short form warning labels to name the specific chemical triggering the exposure warning, and the associated cancer and/or reproductive harm. This is like the requirement for long-form warnings.

For example, a label might state: "Cancer risk from exposure to [name of chemical]" or "Can expose you to [name of chemical], a carcinogen."

The new ruling also adds some signal word options for food warnings and provides tailored safe harbor warnings for passenger or off-highway motor vehicle parts and recreational marine vessel parts.

The final rule takes effect on **January 1, 2025**, with a **three-year grace period**. That means any product manufactured and labeled on or after **January 1, 2028**, must adhere to the new labeling requirements. Put another way, products manufactured and labeled prior to January 1, 2028, with the old short-form warning can continue to be sold as is.

Keep in mind that sourcing the supply chain data, formatting your new labels, and updating your manufacturing process to use the new labels can take a year or even more. The three-year grace period is there to allow companies to meet the 2028 deadline, and many companies will need to start the switchover in 2025.

Proposition 65 is well-known for bounty-hunter legal enforcement. Watchdog groups and law firms have made millions of dollars by suing companies for improper labeling (or a lack of warnings entirely). The new short-form requirements add multiple extra layers of risk:

- Lawsuits over using an out-of-date label format
- Lawsuits over listing an incorrect chemical/hazard combination
- Lawsuits over listing a chemical name that is not actually found in the product (for example, naming lead on a warning label when lead is not present)

More than ever, it will be easy for law firms and consumers to identify a non-compliant label and bring that issue to court.

13 TOXIC CONTROL SUBSTANCES ACT (TSCA)

The Toxic Substances Control Act became law on October 11, 1976, and had a recent update in 2016. The 2016 update is called the Frank R. Lautenberg Chemical Safety for the 21st Century Act (LCSA). This is commonly known as TSCA Reform. The act gives the Environmental Protection Agency (EPA) the authority to gather information on all new and existing chemicals that may pose unreasonable risk to public health or the environment. The EPA is tasked with creating an inventory, performing pre-manufacture reviews before commercial production, requiring testing of chemicals posing risk or in substantial quantities, record keeping and management requirements. There are 6 regulatory programs associated and they fall under 40 CFR 710-799.

Section 8B is the section where chemical substance management is enforced. There is a public list and a confidential list. The list contains chemicals that date back to the 1980s. Companies that manufacture or import over 25,000 pounds of a particular chemical each year must report a Notice of Activity Form (NOA-A) to the EPA as of 2016.

There are several online systems of record required to report a TSCA substance. A Central Data Exchange (CDX) holds the master inventory of records. A Chemical Information Submission System (CISS) is the reporting tool provided by the EPA. If your company falls under the TSCA ruling, we will need to submit a Form B or a Form U. The form must be submitted for each individual site your company manages. A Chemical Data Report (CDR) needs to be electronically through the e-CDR online tool. It is important to make sure that the company does not fall under exclusions or exemptions and therefore does not have to report.

The rules published in January 2021 created new obligations for companies operating, importing, or selling into the U.S. and using any of the following five substances/substance families in U.S. commerce:

- Phenol, isopropylated phosphate (3:1) (PIP (3:1)), CAS 68937-41-7
- Decabromodiphenyl ether (DecaBDE), CAS 1163-19-5
- 2,4,6-tris(tert-butyl)phenol (2,4,6 TTBP), CAS 732-26-3
- Hexachlorobutadiene (HCBD), CAS 87-68-3
- Pentachlorothiophenol (PCTP), CAS 133-49-3

High-risk components include:

- Electronic components and printed circuit boards
- Electrical insulation
- Power supplies and cords
- Cable jackets and wire sheathing
- Gaskets, seals, and O-rings
- Rubberized and plasticized subcomponents
- Thermoplastics and flame-retardant resins

The Toxic Substance Control Act continues to expand its list of hazardous and toxic chemicals with continuous reviews and additions to the Toxic Release Inventory.

13.1 TSCA INVENTORY UPDATED JANUARY 2025

The U.S. Environmental Protection Agency (EPA) has released the latest [Toxic Substances Control Act \(TSCA\) Inventory](#).

The TSCA Inventory is a list of all existing chemical substances manufactured, processed or imported in the U.S. under TSCA that do not otherwise qualify for an exemption or exclusion. This biannual update to the public TSCA Inventory is part of EPA's regular posting of non-confidential TSCA Inventory data. The next regular update of the TSCA Inventory is planned for summer 2025.

The TSCA Inventory now contains 86,847 chemicals, of which 42,495 are active (currently known to be in use) in U.S. commerce. Other updates to the TSCA Inventory include commercial activity data and regulatory flags (e.g., significant new use rules).

For more information on the TSCA Inventory, please visit: <https://www.epa.gov/tsca-inventory>.

13.2 TSCA PFAS 2025 REPORTING REQUIREMENTS

Under the final PFAS reporting rule of the *Toxic Substances Control Act* (TSCA), companies must report information regarding PFAS or PFAS-containing products manufactured or imported between 2011 and 2022. The reporting period will begin on July 11, 2025, and will last for six to twelve months. ([U.S. TSCA](#))

Compliance Alert:

Companies should trace all trade records for PFAS-containing products and confirm their content. Ensure timely submission of PFAS data to the US EPA to meet reporting deadlines and mitigate compliance risks.²⁷

13.3 EPA EXTENDS REPORTING DEADLINE (REMINDER)

The EPA is extending the submission deadline for 2024 Toxic Substances Control Act (TSCA) Chemical Data Reporting (CDR) reports from September 30 to November 22, 2024. The CDR regulations require manufacturers (including importers) of chemicals listed on the TSCA Chemical Substance Inventory (TSCA Inventory) to report data on the manufacturing, processing, and use of those chemicals every four years. For the 2024 data submission period this applies to activities conducted during the calendar years 2020-2023.

The CDR database helps EPA and a variety of interested parties—including communities, other regulatory agencies, industry, researchers and nongovernmental organizations—understand the types, quantities, and uses of chemicals produced domestically or imported into the United States. Understanding how chemicals are being used also helps EPA screen and prioritize chemicals to identify and evaluate potential human health and environmental effects.

EPA is extending the submission deadline in response to recent concerns related to the 2024 reporting tool and technical issues with the ability of the reporting tool to correctly capture substantiations for chemical identity confidential business information (CBI) claims across multiple chemicals. When the copy function in the reporting tool is used, some of the questions and their responses are not copied and are not included with the submission. The reporting tool also prevents a user from adding the missing information if the copy function was used. EPA anticipates that the reporting tool will be working properly by the end of September. This issue only affects submissions with multiple CBI claims. As of now, approximately 29 submissions involve at least one CBI claim for a chemical identity. EPA has not yet confirmed how many of these 29 submissions involve more than one chemical identity being claimed as CBI. This extension only applies to the 2024 submission period.

13.4 EPA PRIORITIZES FIVE NEW CHEMICALS FOR TSCA

There are five chemicals currently under evaluation by the EPA to be added to the TSCA substance list that are considered high priority. The call for public comments is open until October 23, 2024.

²⁷ <https://www.reach24h.com/en/news/industry-news/chemical/2025-industrial-chemical-regulations-eu-us.html>

To read more about each chemical, you can go to the specific dockets on the www.regulations.gov website.

The five chemicals are:

1. Acetaldehyde
2. Acrylonitrile
3. Benzenamine
4. 4'-Methylene bis (2-chloroaniline) (MBOCA)
5. Vinyl Chloride

EPA envisions that the data gathering process to inform annual prioritization efforts will encompass earlier and continued:

- solicitation of input from various stakeholders and individuals,
- identification of data needs for chemical substances that may be identified for prioritization efforts in the future, and
- incorporation of process improvements to more efficiently review readily available information that may be used to identify potential exposure and hazard of industrial chemicals being considered.

The identified potential chemical candidates for each round of prioritization may change annually.²⁸

14 EU BATTERY DIRECTIVE UPDATES AND ENFORCEMENT 2025

Regulation (EU) 2023/1542 is the legislative framework for all batteries placed on the EU market, whether incorporated to a product or not. The Regulation gradually phases out the 2006 Directive, with the first provisions applying from 18 February 2024. During 2025, new obligations become mandatory.

The new Regulation repeals Directive 2006/66/EC as of 18 August 2025. However, certain obligations under the Directive will remain in force beyond this date to ensure continuity. Looking at this year, the transmission of data on collection rate of portable batteries to the Commission should remain in force until 30 June 2025, whereas the obligations related to monitoring and reporting the recycling efficiencies of recycling processes will remain valid until 31 December 2025.

Carbon footprint requirements

According to Article 7, batteries must comply with requirements related to carbon footprints. The Regulation defines carbon footprint as “the sum of greenhouse gas emissions and greenhouse gas removals in a product system, expressed as carbon dioxide equivalents and based on a Product Environmental Footprint (PEF) study using the single impact category of climate change”.

²⁸ EPA-HQ-OPPT-2023-0606-0011_content.pdf

A carbon footprint declaration is required for each battery model for every manufacturing plant of the following batteries:

- Electric vehicle batteries: **18 February 2025** (or 12 months after the date of entry into force either of the delegated act or of the implementing act)
- Rechargeable industrial batteries with a capacity exceeding 2 kWh: **18 February 2026** (or 18 months after the date of entry into force either of the delegated act or of the implementing act)
- LMT batteries: **18 August 2028** (or 18 months after the date of entry into force either of the delegated act or of the implementing act)
- Rechargeable industrial batteries with external storage: **18 August 2030** (or 18 months after the date of entry into force either of the delegated act or of the implementing act)

These batteries must bear labels indicating the battery's carbon footprint and declaring the carbon footprint performance class. However, the carbon footprint performance class requirement will start applying from 2026, depending on the battery's category.

We can expect the European Commission to adapt delegated and implementing acts to set out the format and calculation method for rechargeable industrial batteries by 18 February 2025.

Supply chain due diligence

The EU Battery Regulation imposes battery due diligence obligations on economic operators. These obligations apply from 18 August 2025 and do not apply to “economic operators that had a net turnover of less than EUR 40 million in the financial year preceding the last financial year, and that are not part of a group, consisting of parent and subsidiary undertakings, which, on a consolidated basis, exceeds the limit of EUR 40 million” (Article 47).

Battery due diligence refers to the responsibilities to manage risks, third-party assessments, and share information to identify, prevent, and address social and environmental risks tied to obtaining and handling raw materials for battery production. It also requires setting up battery due diligence policies and some economic operators should have them verified by a notified body.

We expect the European Commission to publish guidelines by 18 February 2025 to further explain some of the above obligations.

Specifically, due diligence is required for:

1. Suppliers of cobalt, natural graphite, lithium, nickel
2. Respect for human rights, environmental considerations, health and safety.

Enforcement of waste battery management

Battery waste management obligations are applicable from **18 August 2025**. Among others, from this date:

- Producers need to register in each Member State in which they place batteries on the market for the first time. The registration is granted upon submission of an application in a “Register of producers”, established by the Member States.
- Producers are subject to the extended producer responsibility (EPR) and related obligations set out in Article 57. Producers can appoint a producer responsibility organisation to fulfill these obligations.

- Producers must provide end-users and distributors with information on the prevention and management of battery waste.
- Distributors are subject to the “take-back” obligation.

When preparing for re-using or re-purposing, operators must verify the state of health of the batteries. This provision applies to waste LMT batteries, waste industrial batteries, and waste electric vehicle batteries.

All batteries shall be marked with the symbol for separate collection:

By August 2025, the European Commission should adopt implementing acts concerning the format for the data and information to be reported to the Commission as well as assessment methods and operational conditions related to collection and treatment of waste batteries.

15 SUMMARY

With the new Trump administration, 2025 is anyone’s guess for which U.S. regulations will continue to be updated and which will be removed. The EPA will need funding to maintain TSCA and the states will need funding for their PFAS, EPR, and chemical databases. Europe is not better off as their economies have been hit hard with once manufacturing powerhouses like Germany being crippled by the cost of energy. The EU will continue to press forward with ESG initiatives, carbon credits, and the push to electrify the world as they see that as an opportunity to keep an industry growing where others have failed.

The regulations we are familiar with for decades will likely remain intact and continue to press forward. Regulations like RoHS, REACH, TSCA, POP, CLP, and California Prop65. A spotlight will continue to shine brightly on PFAS concerns, ESG efforts, anti-trafficking, mineral mining, and labor. Border security and management in addition to stricter sourcing requirements will continue to be in full force. Hang on tight! This is going to be a bumpy ride!

Let’s keep moving forward to meet the compliance challenges of today and tomorrow. Thank you for letting us be part of your team.