



Consumer Products Regulatory Update Year in Review 2025

WEBINAR

November 18, 2025



Our Speaker



Dr Pratik Ichhaporia

Vice President - Technical Services, Consumer Product Testing North America, Eurofins | MTS

Pratik has over 15 years of experience in the TIC (Testing, Inspection and Certification) industry and is an active member of ASTM Committee D13 on Textiles and F15 on Consumer Products. In his position, he provides counsel to clients for creating efficient product safety & compliance programs based on industry best practices along with evolving the legislative & regulatory landscape.



Our Speakers



Anna Nebot Querol

Regulatory Services Director, Eurofins Softlines & Hardlines Regulatory Services Anna graduated in Chemistry from the University of Barcelona in 2002 before completing a master's degree in business management and environmental quality. With more than 20 years of experience in the TIC industry and in the fields of testing and expert services for consumer products, Anna developed and launched an international regulatory department at Eurofins Consumer Product Testing in 2016.

As Regulatory Services Director, she is now focused on Softlines, Leather, Toys & Hardlines regulatory-related topics.



Dara Carr

Technical Communications Lead, Eurofins Sustainability Services

With a background in chemical regulations and a degree in Biochemistry, Dara's role involves creating technical content and supporting project development for a wide range of topics, including sustainability trends, new industry standards and regulations.



Agenda

- EU
- USA
- Canada
- Other Markets
- Sustainability-focused updates



*Your toughest regulatory
pressure in 2025*



EUROPE



REACH - Updates to Candidate List of Substances of Very High Concern (SVHCs)



Nº	Substance name	EC number	CAS number	Examples of use(s)
1	6-[(C10-C13)-alkyl-(branched, unsaturated)-2,5-dioxopyrrolidin-1-yl]hexanoic acid	701-118-1	2156592-54-8	Lubricants, greases, release products and metal working fluids
2	O,O,O-triphenyl phosphorothioate	209-909-9	597-82-0	Lubricants and greases
3	Octamethyltrisiloxane	203-497-4	107-51-7	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
4	Perfluamine	206-420-2	338-83-0	Manufacture of electrical, electronic and optical equipment and machinery and vehicles
5	Reaction mass of: triphenylthiophosphate and tertiary butylated phenyl derivatives	421-820-9	192268-65-8	No active registrations
6	1,1,1,3,5,5,5-heptamethyl-3-[(trimethylsilyl)oxy]trisiloxane	241-867-7	17928-28-8	Used as a laboratory reagent, in cosmetics and personal care products and perfumes and fragrances
7	Decamethyltetrasiloxane	205-491-7	141-62-8	Used in cosmetics and personal care products, in lubricants and greases and in automotive care products
8	Tetra(sodium/potassium) 7-[(E)-{2-acetamido-4-[(E)-(4-[[4-chloro-6-((2-[(4-fluoro-6-[[4-(vinylsulfonyl)phenyl]amino)-1,3,5-triazine-2-yl]amino)propyl]amino)-1,3,5-triazine-2-yl]amino)-5-sulfonato-1-naphthyl]diazenyl]-5-methoxyphenyl]diazenyl]-1,3,6-naphthalenetrisulfonate; Reactive Brown 51	466-490-7	-	Used in textile treatment products and dyes
9	1,1'-(ethane-1,2-diyl)bis[pentabromobenzene] (DBDPE)	284-366-9	84852-53-9	Flame retardant

REACH - “*Universal PFAS restriction*”



In Jan 2023, The Netherlands, Germany, Norway, Denmark and Sweden submitted a restriction proposal to cover a **wide range of PFAS uses**

All uses of PFASs would be covered by this restriction proposal, unless a specific derogation has been formulated

After submission to ECHA, the subsequent six-month consultation resulted in more than 5,600 responses from all stakeholder groups

The information from the consultation led to:

-**Identification 8 more sectors** to be included beyond the 14 sectors named in the initial proposal

-Consideration of **alternative restriction options, beyond a full ban or a ban with time-limited derogations for certain applications.**

On the 15th of September 2025, ECHA announced that it will open a **public consultation in spring 2026** on the draft opinion of its Committee for Socio-Economic Analysis (SEAC) regarding the proposed EU-wide restriction of PFAS.

After reviewing the consultation feedback, SEAC is expected to adopt its final opinion **by the end of 2026.**

Expanded 8 sectors:

- Printing
- Sealing
- Machinery
- Medical packaging and excipients
- Military applications
- Explosives
- Technical Textiles
- Broader industrial uses

POP - New requirements for PFOS, UV-328, Dechlorane Plus



Delegated Regulation	Substance	Main changes	Enter into force date
2025/2118	Perfluorooctane sulfonic acid (PFOS), its salts and PFOS-related compounds $C_8F_{17}SO_2X$	New limits: 1. Concentrations of PFOS or any of its salts equal to or below 0,025 mg/kg (0,0000025 % by weight) where they are present in substances, mixtures or in articles. 2. The sum of concentrations of all PFOS-related compounds equal to or below 1 mg/kg (0,0001 % by weight) where they are present in substances, mixtures or articles.	17/07/2025
2025/843	2-(2H-benzotriazol-2-yl)-4,6-di-tert-pentylphenol (UV-328)	This new entry is added The limits for substances, mixtures or articles are: a) ≤ 100 mg/kg (0,01 % by weight) from 4 August 2025; b) ≤ 10 mg/kg (0,001 % by weight) from 4 August 2027; c) ≤ 1 mg/kg (0,0001 % by weight) from 4 August 2029;	04/08/2025
2025/1930	Dechlorane Plus includes its syn-isomer and anti-isomer	This new entry is added ≤ 1000 mg/kg (0.1%) until April 15, 2028 ≤ 1 mg/kg (0.0001%) after April 15, 2028	15/10/2025



POP - New requirements for PBDEs

Annex I of Regulation (EU) 2019/1021 regarding tetraBDE, pentaBDE, hexaBDE, heptaBDE, decaBDE has been recently modified as follows:

Category	Limit for the sum of tetraBDE, pentaBDE, hexaBDE, heptaBDE and decaBDE	Effective Date
General Mixtures & Articles (Except for food contact materials subject to Regulation (EC) No 1935/2004)	10 mg/kg (sum)	17/11/2025
Mixtures or articles containing or made of recovered materials (Except for food contact materials subject to Regulation (EC) No 1935/2004)	500 mg/kg (sum)	17/11/2025
	350 mg/kg (sum)	30/12/ 2025
	200 mg/kg (sum)	30 /12/ 2027
Toys & Childcare Articles containing or made of recovered materials (Except for food contact materials subject to Regulation (EC) No 1935/2004) Childcare articles: any product facilitating children's seating, sleep, relaxation, hygiene, changing and general body care, feeding, sucking, transportation and protection.	500 mg/kg (sum)	17/11/2025
	350 mg/kg (sum)	30/12/ 2025
	10 mg/kg (sum)	30 /05/ 2027



Textiles - New PFAS testing method for textiles

On the 30th of April 2025, the European Committee for Standardization released the final approved text for the [EN 17681-1:2025](#) standard, which updates the PFAS testing method standard for textiles and textile products.

Key updates include:

Alkaline hydrolysis **step:** This process releases PFAS previously “locked” within polymer matrices, providing a more comprehensive analysis.

Broader detection: Allows identification of both freely extractable PFAS and PFAS released from polymer coatings, including those regulated under REACH and POPs

Revised target list: Updated to align with EU regulatory developments, covering a wide range of PFAS relevant to textiles and textile products

Packaging - New regulation on packaging and packaging waste

Main objective - **promote a circular economy** with requirements such as:

- **Recyclability** criteria (with performance grades)
- **Minimum percentage of recycled content** in plastic packaging
- **Reusable packaging** requirements and **promotion of reuse and refill systems**
- **Minimising the quantity of packaging** through design,...
- **Minimising substances of concern**, such as **PFAS in food contact packaging**
- **Labelling, marking and information requirements** to facilitate **classification, sorting and choice by consumers**.
- Restrictions on **single-use plastic packaging**.
- **Harmonising standards across the European Union**.
- Requirements for **extended producer responsibility (EPR)** and **eco-modulated EPR fees** based on **packaging recyclability performance grades**



In September 2025, ECHA launched a public consultation to identify substances of concern in packaging and packaging waste

The report aims to identify substances of concern found in packaging and packaging components, and to **propose follow-up measures, including potential restrictions.**



Toys - Upcoming Toy Safety Regulation

On the 13th of October 2025, **the Council of the European Union gave its final approval** to the new regulation

Some of the key changes introduced:

- **New chemical safety requirements** such as strengthening the generic ban on hazardous chemicals to include, besides CMR substances (carcinogenic, mutagenic, or toxic for reproduction), endocrine disruptors, respiratory and skin sensitizers, and organ toxicity substances. Prohibiting the presence of PFAS and Bisphenols, within other new chemical requirements.
- Introduction of **Digital Product passport (DPP)**, which will contain key safety information about the toy, thereby improving authorities' ability to detect unsafe products and to facilitate customs control.
- **New responsibilities of economic operators**
- **Cybersecurity** requirements for digital elements of the toy.

This regulation will replace the current Directive 2009/48/EC and aligns with the EU's Chemical Sustainability Strategy, which aims to protect especially vulnerable consumers, such as children.

The text **must now be approved by the European Parliament** before it enters into force – **expected by the end 2025**.

A transition period of **four and a half years** is foreseen for full implementation.



Toys - EN 71 Toy standard updates

New Standards		
Reference	Title	Comments
EN 71-15:2025	Safety of toys – Part 15: Formamide in foam toy materials (content)	Providing standardized methods for substances currently listed under Appendix C of Toy Safety Directive
EN 71-16:2025	Safety of toys – Part 16: Certain chlorinated phosphorus flame retardants (TCEP, TCPP, TDCP) in toy materials	
EN 71-17:2025	Safety of toys - Part 17: Certain isothiazolinones (MIT, CIT, BIT) in aqueous toy materials	
EN 71-18:2024	Safety of toys - Part 18: Phenol in aqueous (content) and polymeric (migration) toy materials	
EN 71-19:2024	Safety of toys - Part 19: Migration of bisphenol A from toy materials	
EN 71-20:2026 (Under approval)	Safety of toys - Part 20: Microbiological safety of toys containing accessible aqueous media	The target is to replace the current protocol NB TOYS CE No 2



Toys - EN 71 Toy standard updates

Updates on EN 71 safety of toys standards		
Reference	Title	Some relevant comments
prEN 71-1 (<i>Under approval</i>)	Part 1: Mechanical and physical properties	Update of tests methods to be aligned with ASTM/ISO (expanding materials and soaking test) // New tests for toys intended to bear a child. New clause on food imitation toys
EN 71-2:2020+A1:2025	Part 2: Flammability	Clarification of the requirements. // Hardness of water for washing toy disguises (less restrictive)
EN 71-3:2019+A2:2024	Part 3: Migration of certain elements	Categorisation of slime to determine if Cat I or Cat II Conformity of Cr III and Cr VI per calculation. Same for organotin
EN 71-4:2020+A1:2025	Part 4: Experimental sets for chemistry and related activities	New requirements for child-resistant containers. Updates in warnings and pictograms
EN 71-5:2025 (<i>Under approval</i>)	Safety of toys - Part 5: Chemical toys (sets) other than experimental sets	New definition of Slime Kit and requirements // Benzene emission limit (from 5 to 1 mg/kg) // Revision of advices for adults and safety rules
EN 71-7:2025	Safety of toys - Part 7: Finger paints - Requirements and test methods	Revision of list of colorants and preservatives // New definition of “booster substance” and requirements
EN 71-8:2025 (<i>Under approval</i>)	Safety of toys - Part 8: Activity toys for domestic use	New definition of “inflatable activity toys” and requirements Revision of requirements for ladders, entrapments, instructions
EN 71-13:2021+A2:2024	Safety of toys - Part 13: Olfactory board games, cosmetic kits and gustative games	New requirements for child-resistant containers
EN 71-14:2025	Safety of toys - Part 14: Trampolines for domestic use	Revision of warnings, markings and instructions

FCM - Ban on bisphenol A and other hazardous



Regulation (EU) 2024/3190 (consolidated under Regulation (EU) No 10/2011)

Applicable to the following groups of food contact materials:

- Plastics
 - Varnishes and coatings (internal and external)
 - Printing inks
 - Adhesives
 - Ion-exchange resins
 - Silicones
 - Rubbers
- Single and repeated-use FCMs are covered
 - Requirements for Declaration of Conformity and supporting documentation
 - Different transitional periods, starting from July 2026

Requirements	
BPA and its salts	Prohibited to be used in the manufacture of FCMs (content <1µg/kg)
Hazardous bisphenols other than BPA or hazardous bisphenol derivatives	
Residual BPA	Prohibited if other bisphenols or derivatives used in the manufacture of FCMs (content <1µg/kg)

Migration **ONLY** applicable for materials falling under Annex II exceptions (permitted uses of BPA in the manufacture of specific applications) as per below table:

Material type	Specific application	Other restrictions
Varnishes and coatings	For use as a monomer or starting substance in the manufacture of liquid epoxy resins to be applied on self-supporting food contact materials or articles with a capacity greater than 1 000 litres.	Migration into food shall not be detectable (< 1µg/kg) Final food contact articles shall be cleaned and flushed prior to first being brought into contact with food.
Plastics	For use as a monomer or starting substance in the manufacture of polysulfone filtration membrane assemblies.	Migration into food shall not be detectable (< 1µg/kg) Final food contact articles shall be cleaned and flushed prior to first being brought into contact with food.

FCM - New requirements for plastic products



Regulation (EU) 2025/351 – *Key changes for food contact plastics*

Key points include (non-exhaustive):

- Requirements for **High degree of purity of substances**
- **Use of biocides** permitted if approved under Regulation (EU) 528/2012
- Requirements for **Multi-material multi-layer materials and articles**
- Requirements for **Recycled plastics** in contact with food (which must also comply with Regulation (EU) 2022/1616)
- **Stricter GMP requirements** : quality assurance system at recycling facilities and for reprocessing of plastics
- Amended requirements for **compliance testing**
- New **labelling requirements**
- Requirements for **supporting documentation**
- New requirements for **Declaration of compliance** (including high degree of purity of substances requirements)



France - PFAS ban on certain consumer products

Law No. 2025-188 of February 27, 2025, aimed at protecting the French population from the risks associated with perfluoroalkyl and polyfluoroalkyl (PFAS) substances.

The main requirements are:

- Ban on the use of PFAS in certain consumer products.
- A tax on manufacturers whose activities lead to PFAS discharge. The fee rate is set at €100 per hundred grams of PFAS discharged per year into the water.

Main dates	Manufacture, import, export, and placing on the market, whether for payment or free of charge, of any textile product containing PFAS is prohibited
01/01/2026	<ul style="list-style-type: none">• Cosmetic products• Wax products• Textile clothing products, footwear, and waterproofing agents for consumers, except for the textile clothing and footwear designed for the protection and safety of individuals, particularly in the performance of national defense or civil security missions.
01/01/2030	Any textile, except for the textile products necessary for essential uses, those contributing to the exercise of national sovereignty and for which there is no substitute, and technical textiles for industrial use

Draft implementing Decree

Defines PFAS limits and exemptions – Expected by Dec'25

Specifies that the bans on PFAS-containing products do not apply if the substances are present below a residual concentration, defined as:

- for any PFAS measured by a targeted analysis, excluding polymers, the threshold is set at **25 parts per billion (ppb)**;
- For the total PFAS measured as the sum of targeted analyses of PFAS, where appropriate with prior impairment of precursors, but excluding polymers, the threshold is set at **250 parts per billion (ppb)**;
- For PFAS including polymers, the threshold is set at **50 parts per million (ppm)**.

Values intended to be revised in the event of changes in the technical rules laid down pursuant to REACH or POP Regulations.



Denmark - PFAS ban on clothing and footwear

On 1st July 2025, [Executive Order No. 464 of 2 May 2025](#) came into effect

- Ban on the import and sale of **clothing, footwear, and certain water-repellent products containing PFAS.**
- Products containing **50 mg or more of total fluorine per kilogram will be prohibited**

This order **does NOT COVER PFAS** in clothing, footwear or waterproofing agents regulated under **REACH and POP Regulations**

Implementation timeline:

1 July 2026 – Ban becomes effective

1 January 2027 – Deadline for selling existing stock

Key Exemptions:

- Reused or recycled clothing and footwear
- Personal protective equipment (PPE) under EU Regulation 2016/425 and PPE where PFAS are essential for safety functions.
- Impregnating agents intended for re-impregnating PPE
- Medical equipment
- Transit goods
- Products where fluorine originates from substances that are not PFAS (with supporting documentation)

Denmark - Draft executive order on food contact materials



The draft was **notified to the EU Commission on July 17, 2025**, with a standstill period ending October 20, 2025 (extended to January 19, 2026 for comments).

Expected entry into force: **January 1, 2026**, replacing the current Executive Order No. 681 of May 25, 2020.

Some Highlights of the draft order text:

0. Scope: the order lays down national specific measures for:

- Ceramics, enamelled articles and glassware
- Paper and cardboard
- Declaration of conformity

- 1. Ceramics, Enameled Articles & Glassware:** Stricter migration limits for lead and cadmium and new product categorizations for testing and compliance.
- 2. Paper & Cardboard: Ban on PFAS** (per- and polyfluoroalkyl substances) unless an effective functional barrier prevents migration into food.
- 3. Vinyl chloride requirements:** ≤ 0.01 mg/kg for vinyl chloride migration (method in Annex 3 of the order)
- 4. Declaration of Conformity (DoC):** Mandatory for all FCMs at stages prior to retail, including ceramics not yet in contact with food. Detailed requirements in Annexes 1 & 2

Limit values for Pb and Cd from ceramic, enamelled articles and glassware:

Object	Lead	Cadmium
Category A:		
Objects that cannot be filled	≤ 0.3 µg/dm ²	≤ 0.4 µg/dm ²
Flatware		
Drinking rim		
Category B:		
Baby bottles	≤ 1.5 µg/L	≤ 0.35 µg/L
Articles intended for drinking		≤ 0.70 µg/L
Other articles that can be filled		≤ 2.0 µg/L



Amendment to Commodities Act – Effective July 1, 2025

The amendment updates several chapters in Part A of the Annex by:

- Harmonizing specific migration limits (SMLs) for certain substances with those in Regulation (EU) No. 10/2011 on food contact plastics (as consolidated up to March 2025).
- Amending certain SMLs in different chapters :
 - Chapter I: Plastics
 - Chapter II: Paper and board
 - Chapter III: Rubber
 - Chapter IV: Metals
 - Chapter IX: Wood and cork
 - Chapter X: Coatings
 - Chapter XII: Epoxy polymers



UK - Persistent Organic Pollutants

In March 2025, the UK POPs Regulation was amended as follows:

- Adding **Dechlorane Plus** and **UV-328**
- Adding **Methoxychlor** (already included in EU POP Regulation and aligned with it)
- Amending the entries for **Hexachlorobenzene**, **Pentachlorophenol** and **Perfluorooctanoic acid** (aligned with EU POP Regulation)

However, in May 2025, the Persistent Organic Pollutants (Amendment) (No. 3) Regulations 2025 ([S.I. 2025 No. 605](#)) was published:

Removing the entries for Dechlorane Plus and UV-328 that were previously added in March.

UK - Exclusions in the UK Furniture and Furnishings (Fire) (Safety) Regulations



On the 30 of April 2025, [The Furniture and Furnishings \(Fire\) \(Safety\) \(Amendment\) Regulations 2025](#) was published.

These regulations amend the Furniture and Furnishings (Fire) (Safety) Regulations 1988 (“the 1988 Regulations”).

The main amendments are:

- It sets out a list of **baby and children’s products to be excluded from scope** of the Furniture and Furnishings (Fire) (Safety) Regulations 1988.

- **Removing the requirements about a display label**, both at the initial point of sale and in the secondhand market.

- It extends the time limit for instituting legal proceedings arising from six months to twelve months.

The amendment came into force on 30 October 2025.



USA

CPSC Commissioners - Current Status



Supreme Court removal decision: In a 6–3 ruling, the Supreme Court temporarily upheld President Trump’s authority to remove three Democratic CPSC commissioners (Boyle, Hoehn-Saric, Trumka Jr.) despite “for cause” protections, staying a lower court decision based on Humphrey’s Executor and aligning with its recent NLRB/MSPB orders.

Vacancy and acting leadership: Commissioner Douglas Dziak resigned on August 22, 2025; since then, Acting Chairman Peter Feldman has served as the sole commissioner with delegated authorities.

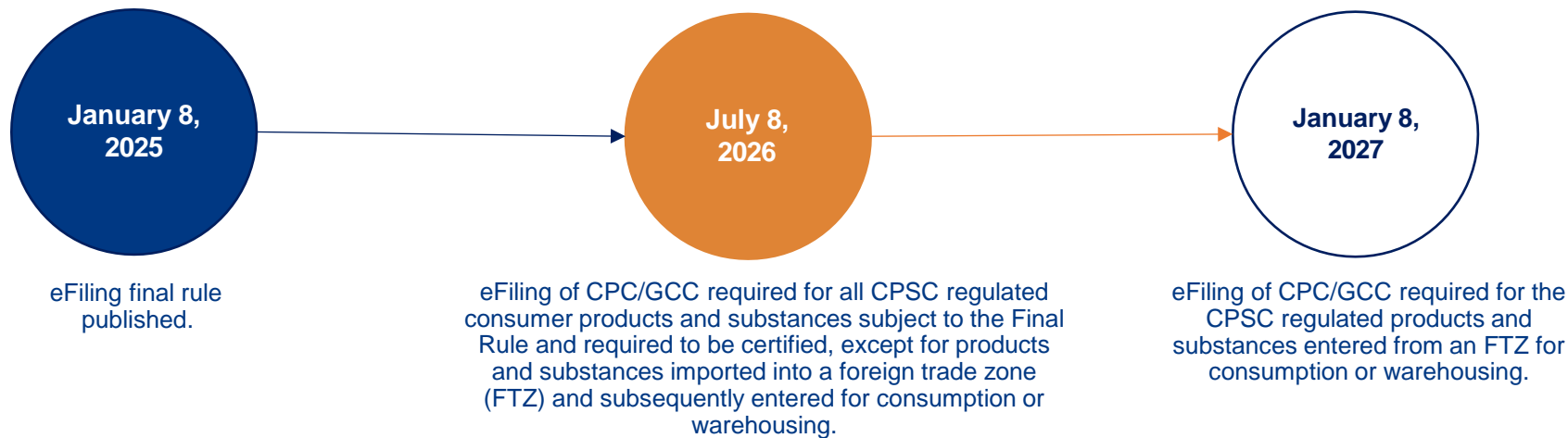
New nomination to fill vacancy: President Trump nominated William “Billy” Hewes III (MS) to be CPSC Commissioner for a term expiring October 26, 2031; the nomination was received by the Senate on October 2, 2025, and referred to the Senate Committee on Commerce, Science, & Transportation (confirmation hearing TBD).



eFiling Final Rule - Scope & Timeline

A product that is subject to a consumer product safety rule, ban, similar rule, standard, or regulation, and which is imported for consumption or warehousing, or distributed in commerce must be certified.

Responsibility: Importer of record. eFiling rule expanded this definition and align with the CBP definition.



Submit the Certificate data to the CPSC Product Registry:

- Batch Upload
- API



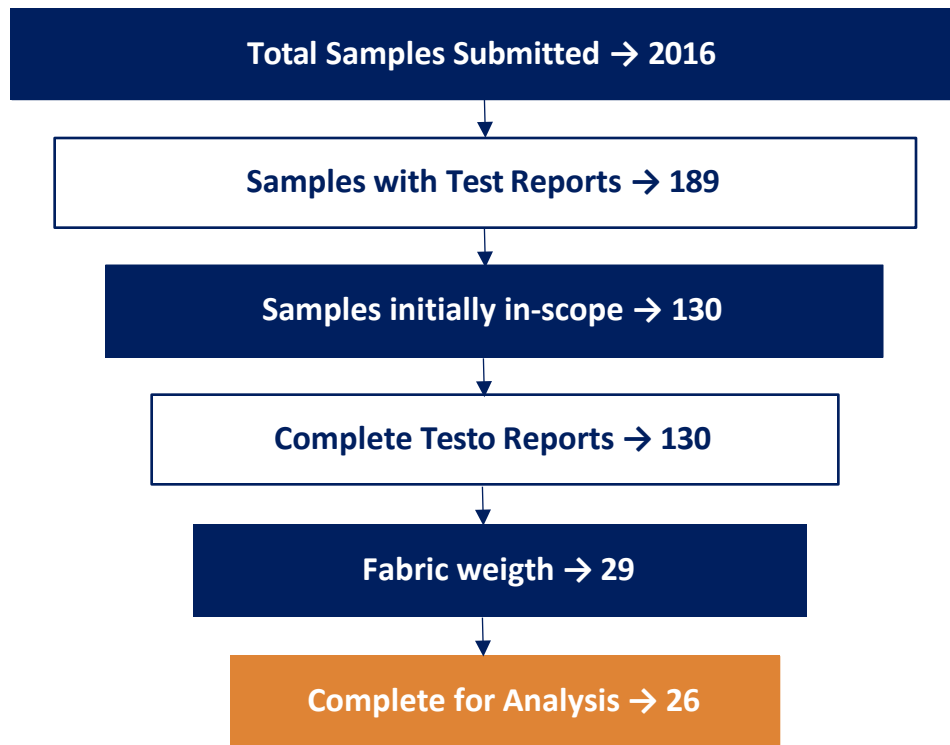


CPSC Letter to AAFA

Request for exemption from the flammability of general wearing apparel (16 CFR 1610) testing of fabrics with **spandex blended with exempt fibers**.

Response to AAFA petition for burden reduction.

CPSC staff letter on September 9, 2025 requesting more data.





CPSC - FR Water Beads

Scope: Applies to water bead toys and toys that contain water beads (e.g., toy experiment kits, sensory kits, toy squeeze/sensory balls, and water bead toy guns marketed for children under age 14).

“Various shaped liquid absorbent polymer, composed of materials such as, but not limited to, polyacrylamide and polyacrylate, which expands when soaked in liquid.”

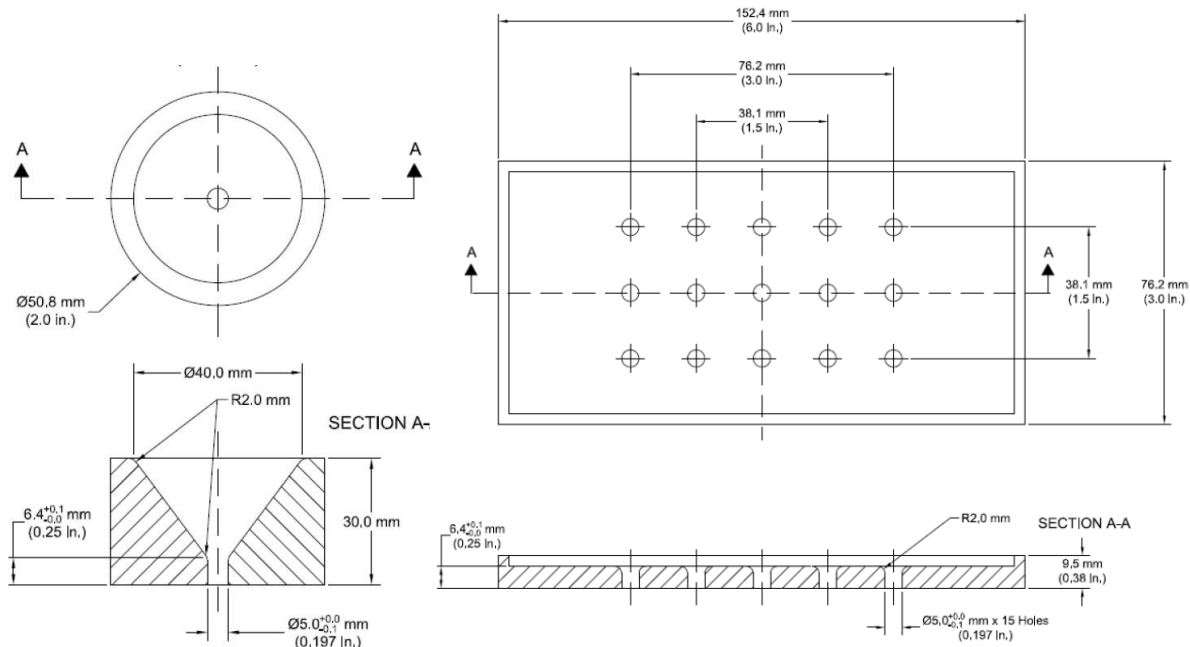
Water beads that are not toys and not contained in toys, such as those sold for decoration (e.g., candle holders), plant hydration, air fresheners, deodorizers for cat litter, or first-aid cold packs.

Effective date: 90 days after publication in the Federal Register.



CPSC - FR Water Beads - Requirements

Water beads (as received or removed from a toy) that fit entirely inside the small parts cylinder in their dehydrated state shall remain whole and completely pass through a **funnel OR sieve test gauge** under their own weight after expansion.





CPSC - FR Water Beads - Acrylamide

Water beads must be submerged in deionized water maintained at $37 \pm 2^{\circ}\text{C}$ ($98.6 \pm 3.6^{\circ}\text{F}$) for up to 72 hours (or the time interval showing greatest expansion).

The proposed 50% expansion limit was removed from the final rule.

Water beads shall not have more than **325 μg extractable acrylamide**. The 325 μg limit applies per 100 small water beads (defined as < 4 mm in all dimensions prior to hydration) or per one large water bead (defined as ≥ 4 mm in any dimension prior to hydration).



CPSC - FR Water Beads - Labelling

Warnings must be on the principal display panel of the toy packaging. If no packaging or insufficient space, a hangtag or sticker must be used.

When provided, instructional literature shall have the same warning labels as the packaging, but color is not required if warnings contrast with the background.

Figure 4 to paragraph (d)(1)(i)—Warning for Water Bead Toys and their Packaging.

⚠ WARNING
Contains water beads that can grow larger when swallowed or inserted in the ear or nose. Children have DIED when the beads blocked their intestines. Inserted beads have resulted in surgeries.
<ul style="list-style-type: none">• Keep away from babies and toddlers. Watch older children during use.• Get medical help right away if you think your child swallowed or inserted beads.

Figure 5 to paragraph (d)(1)(ii)—Warning for Toys with Contained Water Beads and their Packaging.

⚠ WARNING
Contains water beads that can grow larger when swallowed or inserted in the ear or nose. Children have DIED when the beads blocked their intestines. Inserted beads have resulted in surgeries.
<ul style="list-style-type: none">• Keep away from babies and toddlers. Watch older children during use.• Discard product if beads start to come out.• Get medical help right away if you think your child swallowed or inserted beads.

CPSC - FR Neck Float



Neck floats, articles (inflatable or not) that encircle the neck, support the child's weight by securing around the neck, used for play in sinks, baths, paddling pools, and pools, intended for children up to and including 4 years.

Excluded:

- U.S. Coast Guard-regulated life-saving devices (including those attaching at the neck).
- FDA-regulated medical devices.

Effective: 180 days after Federal Register publication.

Stockpiling prohibition (CPSA §9(g)(2)) to prevent circumvention ahead of the effective date.



CPSC - FR Neck Float

Key Performance Requirements

- Slip-through not tied to inflation (fit/geometry/child movement).
- Slip-through tied to inflation (deflation/under-inflation).
- Restraint system failure (fastener strength & integrity).
- Submersion without slip-through (tilt/rotation/flip)

Figure 2 to paragraph (d)(1)(i) – Warning for Neck Floats and Packaging.

⚠ WARNING
<p>THIS PRODUCT DOES NOT PREVENT DROWNING</p> <p>Children have died after slipping through neck floats. Neck opening can get bigger during use, even if it feels snug. Your child can drown in as little as 1 inch of water.</p> <ul style="list-style-type: none">• Always stay within arm's reach to keep your child's mouth above water.• {Check for leaks before each use. Never use with leaks.}• Use only for children ages [specify lower bound for age] to [specify upper bound for age] and weighing [specify lower bound for weight] to [specify upper bound for weight].

CPSC - DNP Sec 104 Updates



Product	Rule Status	Final / Effective Date	Cited Standard / CFR	Very Important Notes
Stationary Activity Centers	Direct Final Rule	Jul 5, 2025	ASTM F2012-24	New warning-label permanency pull test (5-sec ramp + 10-sec hold); four new example warnings; editorial clarifications.
Non-Full-Size (NFS) Baby Cribs	Direct Final Rule	Apr 5, 2025	ASTM F406-24 (play-yard-only sections excluded)	Clarified accessory definitions ; strangulation warnings expanded to all NFS-crib accessories; labels required on each accessory.
Play Yards	Direct Final Rule	Apr 5, 2025	ASTM F406-24	Clarified accessory definitions ; new cord/strap loop length limits + clarified test; mattress labels must specify using only the manufacturer's mattress or one naming brand/model.
Infant Support Cushions	Final Rule (16 CFR 1243)	May 5, 2025	16 CFR 1243 (performance & labeling)	Max incline ≤10°; no restraints; firmness & sidewall angle tests; strong, permanent on-product warnings; product registration card required (16 CFR 1130).
Nursing Pillows	Final Rule (16 CFR 1242)	Apr 23, 2025	16 CFR 1242 (performance & labeling)	Restraints prohibited; seam/caregiver-attachment strength, firmness, infant containment ; product registration card required (16 CFR 1130).
Infant Bath Seats	Direct Final Rule	Jan 4, 2025	ASTM F1967-24	Incorporates latest ASTM without modifications ; scope covers seats used in tub/sink that support front/back of seated infant.



EPA Proposes Major Relief for TSCA PFAS Reporting

On November 13, 2025 the EPA proposed targeted revisions to the TSCA §8(a)(7) PFAS Reporting Rule (40 CFR Part 705).

Goal → make the 2023 one-time PFAS reporting requirement “more practical and implementable.”

Key takeaway for article importers: Full exemption proposed for PFAS in imported articles.

Estimated cost savings: \$786–\$843 million across industry.



Key Proposed Revisions

Provision	Current (2023 Final Rule)	Proposed Amendment (Nov 2025)
Imported Articles	Reporting required for PFAS in imported articles (2011–2022).	Full exemption for PFAS contained in imported articles.
De Minimis Threshold	No threshold; any PFAS triggers reporting.	0.1% de minimis exemption for PFAS in mixtures or articles.
R&D Activities	Not exempt.	PFAS manufactured/imported solely for research & development exempted.
Impurities & Byproducts	Impurities and certain byproducts required to be reported.	Exemption for impurities, non-isolated intermediates, and certain byproducts.
Submission Deadline	April 13–October 13, 2026 (with small article importer deadline of April 13, 2027).	Removes small importer deadline due to article exemption. New reporting window opens 60 days after final rule → remains open 3 months.

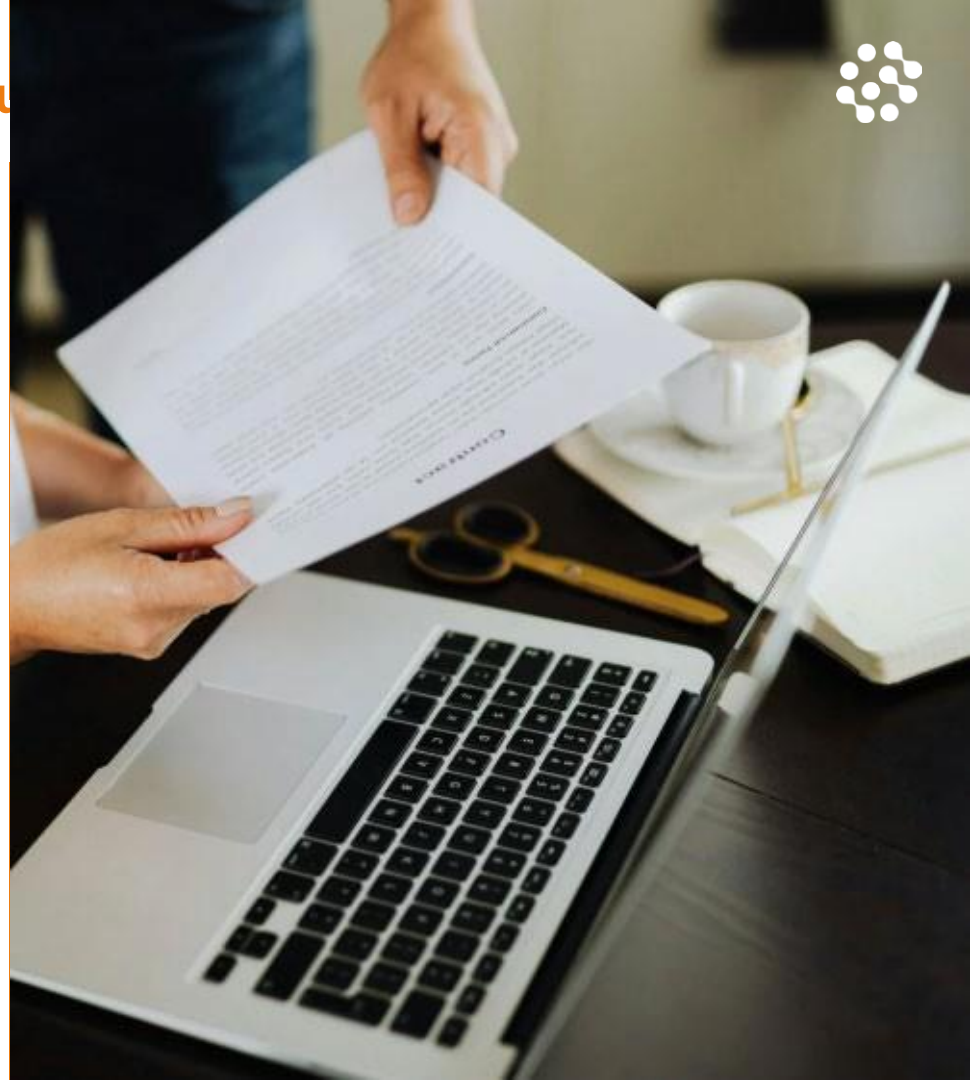
Timeline and Pu

EPA invites comments on:

- Justification for article exemption
- Appropriateness of 0.1% threshold (vs. 1%)
- Whether to add a production volume threshold (e.g., 2,500 lbs)

Public Comment Deadline:

December 29, 2025.





Prop65 - 60-Day Notices

- **BPS:**

- ✓ Paper receipts
- ✓ Clearance sticker on a garment.
- ✓ Price tag on a garment.

- **PFOA**

- ✓ Jackets
- ✓ Pet beds
- ✓ Dog vests
- ✓ Pet clothing, including jackets

- **Cr VI:**

- ✓ Golf glove
- ✓ Leather footwear

Minnesota MPCA to Extend PFAS Reporting Deadline



The Minnesota Pollution Control Agency (MPCA) announced its intent to extend the initial January 1, 2026 reporting deadline for products with intentionally added PFAS to July 1, 2026 (a six-month extension), following stakeholder feedback.

Background

- Proposed “PFAS in Products: Reporting and Fees Rule” introduced April 2025.
- Public hearing held May 22, 2025; 67 written comments and 11 verbal testimonies received.
- Manufacturers raised concerns about timing, feasibility of data collection, and scope of covered products.



New Mexico Regulates PFAS in Consumer Products

On April 8, 2025, the State of New Mexico passed HB 212 into law to regulate Per- and Poly-Fluoroalkyl Substances (PFAS) in various consumer products with different enforcement dates. PFAS is defined as any substance in a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom.



NM Regulates PFAS in Consumer Products

Scope	Requirement	Effective Date
Cookware	Intentionally added PFAS prohibited	1-Jan-27
Food packaging		
Dental floss		
Juvenile products		
Firefighting foam		
All products	Reporting if intentionally added PFAS	1-Jan-27
Carpets/rugs	Intentionally added PFAS prohibited	1-Jan-28
Cleaning products		
Cosmetics		
Fabric treatments		
Feminine hygiene products		
Textiles		
Textile furnishings		
Ski wax		
Upholstered furniture		
All products	Prohibited if requested testing by DOE demonstrates the product contains intentionally added PFAS and the manufacturer has failed to provide reporting information	1-Jan-28
All products	Intentionally added PFAS prohibited, unless the manufacturer has fulfilled reporting requirement	1-Jan-28
All products	Intentionally added PFAS prohibited	1-Jan-32

UT - Law

April 9, 2025, Utah amended the Bedding, Upholstered Furniture, and Quilted Clothing rule to remove all references and requirements for digital textile and digital law label for online sales.



PA - Stuffed

Reminder that new submissions must include lab reports: flammability + tolerance testing with application (effective Aug 27, 2024; use new forms).

Annual license term: registration renews yearly.

Fees increase Nov 8, 2025 (initial & renewal stuffed-toy license \$96.84; other fees updated).

PA URN tag still required on stuffed toys; recycled-content toys have added labeling expectations.



DTSC Proposes Listing Microplastics as Candidate Chemical



DTSC undertook rulemaking to add microplastics to its Candidate Chemicals List, a first and crucial step under California's Safer Consumer Products (SCP) Program.

Goal: This does not immediately impose regulations but enables DTSC to later designate "Priority Products" that contain or release microplastics.

"Microplastics" are plastics that are less than 5 millimeters (mm) in their longest dimension, inclusive of those materials that are intentionally manufactured at those dimensions or are generated by the fragmentation of larger plastics.

Public comment closed on August 4, 2025

Public workshop on microplastics in consumer products research on December 11, 2025, from 9:30 AM Pacific Time (PT) – 12:00 PM (PT).



WA SB5628 - Lead in Aluminum Cookware

On May 13, 2025, Washington Gov. Bob Ferguson signed SB 5628 amending Ch. 70A.565 RCW, narrowing the law to aluminum or brass cookware, cookware components, and utensils (e.g., pots, pans, kettles, grills, internal pots for rice/pressure cookers, lids, rivets, valves, knives, forks, spoons, spatulas), excluding aluminum/brass fully enclosed by stainless steel and bodies of electronic devices with removable cooking containers.

Lead limits – manufacturers, retailers, wholesalers

- Jan 1, 2026: No manufacture, sale, offer for sale, distribution, or knowing sale in WA of covered aluminum/brass cookware, utensils, or components with lead (including compounds) > 90 ppm.
- Jan 1, 2028: Lead limit tightens to 10 ppm.
- Potential future tightening.

FDA Issues Letter to Warn of Certain Lead Leaching Cookware



On December 12, 2024, the FDA issued a letter to cookware retailers and distributors to inform that certain imported cookware made from aluminum, brass, and aluminum alloys known as Hindalium/Hindolium or Indalium/Indolium may leach lead into food and that such cookware shall not be distributed or sold in the U.S. market. Cookware products that bear or contain an unsafe food additive are adulterated under 21 U.S.C. 342(a)(2)(C)(i) and are prohibited under the Food, Drug, and Cosmetic Act.

The FDA placed a certain manufacturer of the cookware on an FDA import alert and their products are subject to refusal of admission in the U.S.



Key Determination

- Dinnerware manufactured from the sheath of Areca catechu palm tree leaves is not Generally Recognized As Safe (GRAS) for food contact.
- It is considered an unapproved and unsafe food additive, making products containing it adulterated under the FD&C Act.

Reasons for "Not GRAS" Determination

- Presence of Toxic Alkaloids
- Alkaloid Migration to Food
- Adverse Health Effects



CANADA

Health Canada Public Consultation - CSU Stability (Tip-Over)



Proposal: Update CCPSA General Prohibitions (Table 3) for free-standing clothing storage units (CSUs) to reference ASTM F2057-23 as the safety benchmark.

Comment window: Closed on Nov 7, 2025.

Scope (CSUs covered): Free-standing units (dressers, chests, armoires, etc.) ≥ 686 mm (27 in) height, ≥ 13.5 kg (30 lb) mass, and ≥ 90.6 dm³ (3.2 ft³) enclosed storage; excludes built-ins and non-clothing storage.

Implications for brands/retailers:

- Design, test, and label CSUs to meet ASTM F2057-23 performance & warning requirements.
- Treat tip restraints as supplemental—not a substitute for inherent stability.

OTHER MARKETS

Turkey - New labelling rules for products of animal origin



On the 9th of April 2025, the Turkish Ministry of Trade introduced new consumer protection regulations **requiring clear labelling of products containing materials of animal origin**. (Official Gazette ([No. 32865](#)))

Requirements:

- Sellers must **disclose the animal source** of any product containing parts of animal origin.
- This information must be **clearly presented in Turkish**, in a legible and non-misleading manner, and made available before the purchase.
- The disclosure can appear on the **product label, packaging, or an accompanying document**.
- For **online or distance sales**, the information must be displayed where the **product's characteristics** are described—typically on the product page.

The regulation applies to a wide range of consumer goods, including leather products, textiles, garments, and footwear.



China - RoHS standards update

On August 1, 2025, the China RoHS **new MANDATORY standard** [GB 26572-2025](#) was released fully replacing the previous voluntary standard GB/T 26572-2011 - In effect from August 1, 2027.

Expanded Scope of Hazardous Substances:

DBP, DIBP, BBP, DEHP, Pb, Cd, Hg, Cr (VI), PBBs, PBDEs

Unified Mandatory Testing Method

GB 26572-2025 explicitly standardizes compliance verification by mandating the use of the GB/T 39560 series – ‘Determination of Certain Substances in Electrical and Electronic Products’—as the sole testing methodology

Mandatory Labeling Requirements

Restriction of Hazardous Substances (RoHS) Mark for Electrical and Electronic Products:





China - updates in FCMs standards

In March 2025, several test methods for FCM were released:

No	Standard title	Mandatory standard		Standard type	Effective date
		New Version	Replacing		
1	Determination of phthalate esters and migration of food contact materials and products	GB 31604.30-2025	GB 31604.30-2016	Test method	2025-09-16
2	Determination of residual and migration of vinyl chloride, 1,1-dichloroethylene and 1,1-dichloroethane	GB 31604.31-2025	GB 31604.31-2016	Test method	2025-09-16
3	Food contact materials and articles – Determination of migration of 2,2,4,4-tetramethyl-1,3-cyclobutanediol	GB 31604.61-2025		Test method	2025-09-16
4	Determination of migration and release of N-nitrosamines	GB 31604.62-2025		Test method	2025-09-16
5	Determination of 4,4-biphenyl glycol and 1,1-sulphonyl bis(4-chlorobenzene)	GB 31604.63-2025		Test method	2025-09-16
6	Standards for the use of additives for food contact materials and products	GB 9685-2016 Amd. 1		Requirements	2025-03-16

China - GB 18584-2024 Limit of harmful substances in furniture



Effective from July 1, 2025

Scope

Applies to **all types of furniture products** (wooden, upholstered, metal, etc.).

Specifies **limit requirements**, **test methods**, and **judgment rules** for harmful substances.

1. Formaldehyde, Benzene, Toluene, Xylene, and Total Volatile Organic Compounds (TVOC)
2. Migration of heavy metals from coatings and paints
3. Phthalates, PAHs, Azo dyes
4. Radionuclide, Dimethylfumarate, Polybrominated biphenyls (PBBs), Polybrominated diphenyl ethers (PBDEs)

China - GB 18580-2025 Formaldehyde Emission Limits for Wood-Based Panels



Issued: May 30, 2025 // **Effective:** June 1, 2026

Replaces: GB 18580-2017

Applies to **wood-based panels and their products** used for **interior decoration and refurbishment**.
Covers **production, inspection, and trade** of these materials.

Main requirements	
Formaldehyde Emission Limit:	Panels and products must meet stricter emission limits (updated from 2017 version). Limit values expressed in mg/m³ using 1 m³ climate chamber method
Labeling:	Mandatory indication of compliance with formaldehyde emission class
Testing Method:	Standardized climate chamber method for formaldehyde release.
Judgment Rules:	Clear criteria for pass/fail based on emission measurements.
Quality Control:	Manufacturers must implement production quality control methods for formaldehyde emission.
Terminology Update:	Expanded definitions for wood-based panels and related products.

SUSTAINABILITY UPDATES



Ecodesign for Sustainable Product Regulation (ESPR)



Sustainability
Services

Establishes a framework to set Ecodesign requirements to improve product circularity



to virtually all physical products

Introduces the Digital Product Passport (DPP)



Entered into force: 18 July 2024

Updates for 2025 & beyond

- February 2025:** First Ecodesign Forum meeting
- April 2025:** First Working Plan (2025-2030) adopted under ESPR & Public consultation for DPP system launched
- September 2025:** EC published draft implementing regulation under ESPR – reporting on destruction of unsold consumer products
- October 2025:** CEN published CWA 18291:2025
- 2026 & beyond**
 - DPP for textiles & apparel estimated early 2027
 - Detergents end-2025
 - Iron & steel by end 2026 / early 2027

EU Deforestation Regulation (EUDR)

No deforestation-linked products in EU markets



Cocoa, coffee, palm oil, soy, wood, rubber



Products derived from these commodities
Leather, fur, and other hides

Entered into force: 29 June 2023

Updates for 2025 & beyond

- **April 2025:** Updated guidance and revised FAQs
- **May 2025:** EC published Implementing Regulation (EU) 2025/1093 & measures aimed at reducing burdens introduced
- **July 2025:** European Parliament objection
- **October 2025:** Proposal to streamline implementation
- **December 2025:** Law applicable for large and medium companies
- **2026 & beyond**
 - 30 December 2026 – law applicable for micro and small enterprises
 - 2026 – review of country classification (NGO commentary)

Corporate Sustainability Reporting Directive (CSRD)

Requires large and listed to report on the social and environmental risks they face, and how their activities impact people and the environment.



Applies to companies with > 1,000 employees and a turnover or a balance sheet total > €25 million



Requires companies to disclose detailed, standardised, and verifiable sustainability information in line with the European Sustainability Reporting Standards (ESRS).

Entered into force: 2023

Updates for 2025 & beyond

- February 2025:** simplification package ("Omnibus") adopted by European Commission
- April 2025:** 'Stop the clock' Directive formally adopted by Council of EU (Omnibus I package)
- July 2025:** Adoption of "quick-fix" delegated act to revise first set of ESRS & adoption of recommendation on voluntary sustainability reporting for SMEs
- October 2025:** Study on the effectiveness of framework for corporate governance
- 2026 & beyond**
 - Negotiations between European Parliament and Member States
 - Large EU companies & listed non-EU companies reports due **2028** (FY2027)
 - Non-EU companies with significant EU activities reports due **2029** (FY2028)

Green Claims Directive

To empower consumers with reliable information to make sustainable purchasing choices and combat greenwashing claims.



Intended to cover all consumer products and services sold in the EU market



Closely linked to other EU policies

Initially proposed: March 2023

Updates for 2025 & beyond



June 2025: European Commission announced its intention to withdraw

2026 & beyond

- Hard to anticipate
- Green Transition Directive unaffected

Empowering Consumers for the Green Transition Directive

To support a circular, clean, and green EU economy by helping consumers make informed choices and preventing unfair practices that discourage sustainable purchases



mic sectors in scope



Changes the Unfair Commercial Practices Directive and the Consumer Rights Directive

Adopted: February 2024

Updates for 2025 & beyond

September 2025: implementing regulation adopted to better inform consumers across European Union about their legal guarantee rights and durability guarantees offered by businesses

2026 & beyond

- Member States working to transpose into national law with Full implementation due **September 2026**
- **September 2026** - consumers will be able to see new notice and label in practice

Anti-waste Law for a Circular Economy (AGEC)

Eliminate waste and pollution from the design stage and transform the system of production, distribution, and consumption from a linear to a circular economic model



Applies to all companies that sell in France



Wide range of consumer goods are in scope e.g. textiles, electronics, furniture, packaging, and batteries

Implemented: 2020

Updates for 2025 & beyond

January 2025:

- Decree No. 2025-80 effective
- Durability index supplements Repairability Index
- Ban on use of mineral oils (packaging)
- Packaging made of non-recyclable styrenic polymers are prohibited
- Minimum of 25% recycled plastic in PET bottles

October 2025: brands must calculate & display the “environmental cost” of textile products

End of 2025: 20% reduction of single-use plastic packaging (compared to 2018)

2026 & beyond

- Tougher enforcement, penalty hikes, and greater regulatory oversight
- Minimum of 30% recycled plastic in PET bottles by 2030
- Total elimination of single-use plastics by 2040

Extended Producer Responsibility (EPR) in EU Member States



Sustainability
Services

Country	Scope of EPR Scheme(s) (Product category)	Status of EPR	Eco-modulation criteria included?	Notes/comments
France	Packaging	Implemented	Yes	Packaging ecomodulation since 2010
France	Textiles	Implemented	Yes	<ul style="list-style-type: none"> • 1st phase = During 2025, declaration of references for bonuses and penalties, and transmission of supporting documentation where applicable. • 2nd phase = In 2026, declaration and control of eco-modulated quantities placed into the market for references declared and validated during phase n°1. • 3rd phase = In 2026, payment of bonuses or invoicing of penalties by Refashion, if applicable.
France	Furniture, DIY and Toys	Implemented	Partially	Furniture and toys categories are now starting to create and implement eco-modulation criteria
Netherlands	Packaging	Implemented	Yes	Modulation Fee 2.0 is Active 2024. For plastic packaging
Netherlands	Textiles	Implemented	No (*)	(*)The EPR Decree leaves it up to producer organisations to apply eco-modulation fees.
Hungary	Packaging	Implemented	No	
Hungary	Textiles	Implemented	No	Introduced EPR for textiles in July 2023, requiring obligated companies to register with the National Waste Management Authority by May 31, 2023. Scope includes apparel, clothing accessories, household linens, curtains, blankets/rugs, footwear, and carpets.
Latvia	Packaging	Implemented	No	
Latvia	Textiles	Implemented	No	Products included are clothes, clothing accessories, shoes and household textiles.
Denmark	Packaging	Implemented	Yes	Ecomodulation from October 1 2025
Italy	Packaging	Implemented	Yes	Plastic modulation since Jan 2018, full adjustments by July 2025, with a second increase for glass packaging EPR Fee expected from 1st January 2026.
Germany	Packaging	Implemented	No (*)	(*)Legal basis in place since 2019; practical implementation delayed to 2026+ awaiting updates aligned with the EU PPWR, which becomes binding from 12 August 2026.
Belgium	Packaging	Implemented	Yes (*)	*Not statutory; via Fost Plus Green Dot tariff system.
Belgium	Textiles	In progress	No	There is also development for textiles, using CIRCLETEX as PRO
Spain	Packaging	Implemented	Yes	Ecomodulation active since 2023. There are other ecomodulation coming up in the future in terms of Batteries, EEE, and textiles, but nothing official for the moment.
Spain	Textiles	Under consultation	No	In April 2025, a pilot scheme for textile waste collection commenced, lasting one year. The results of this pilot were evaluated to produce recommendations and guidelines for effective waste collection. In September 2025, consultation on the Draft Royal Decree closed, but approval has been delayed due to the large number of comments received.
Portugal	Packaging	Implemented	No	Will be Introduced 2026
Sweden	Packaging	Implemented	Yes	Active since January 2023 – but not legally mandatory
Sweden	Textiles	In progress	In progress	Meant to go into effect in 2022 with 2 years for affected companies to comply. To date, the government is still in the process of implementing the bill, making the compliance timeline unclear. The scheme will apply to all clothes, household textiles, bags, and accessories. Notable exemption: producers who create products using >80% textile waste
Finland	Packaging	Implemented	Yes	
Austria	Packaging	Implemented	No	Under Study from BMK. Estimated time of implementation: 2026+

Canada's Revised Green Guides

To help businesses comply with the Competition Act, particularly with the new "greenwashing" provisions

Environmental Claim: Any representation about the environment made to promote a product, service, process, business, or business activity, including impacts from material sourcing through end-of-life.

New provisions include:

- Product environmental benefits
- Product or business activity environmental benefits

Final guidelines released: June 2025

Updates for 2025 & beyond

June 2025:

- Final guidelines released following two rounds of public consultations conducted throughout the past year

2026 & beyond

- CBC enforcement activity on environmental claims is expected to increase

Key principles from the guidelines

Truthful and Not Misleading: Claims must be true in both literal meaning and general impression. Avoid relying on disclaimers to cure misleading claims.

Product Benefits/Performance Claims Tested: Based on adequate and proper testing conducted before the claim is made.

Specific Comparative Claims: Clearly state what is being compared and the extent of the difference.

Avoid Exaggeration: Do not overstate environmental benefits.

Clear and Specific: Avoid vague claims (e.g., "eco-friendly") that might imply broader benefits than are true for the entire life cycle or business.

Supported Future Claims: Claims about future environmental performance (e.g., net-zero goals) must be supported by adequate and proper substantiation, a concrete plan with interim targets, and meaningful steps underway.

Packaging EPR in US States



Sustainability
Services

State	Law (Year)	Producer Must Do	Key 2025–2030 Milestones
Oregon	Plastic Pollution & Recycling Modernization Act (2021)	Join PRO (CAA), report, pay fees	Plan approved Feb 21, 2025; program began Jul 1, 2025.
Colorado	HB22-1355 (2022)	Join PRO (CAA), report, dues	Supply report due Jul 31, 2025; dues start Jan 1, 2026; program begins early 2026.
California	SB 54 (2022)	Join PRO (CAA), report, pay SB54 fees	Reporting (2023 data) due Nov 15, 2025; plan mid-2026; program begins on/ before Jan 1, 2027.
Maine	LD 1541 (2021) + 2025 “fix” bill	Register with Stewardship Org (SO), report, pay fees	SO RFP late-2025; producers register & report May 2026; startup fees ~Sep 2026; municipal payments Oct 2027.
Minnesota	Packaging Waste & Cost Reduction Act (2024)	Join PRO (CAA accepted), meet design & reporting	First deadlines begin Jul 1, 2025; design requirements phase toward 2032.
Maryland	SB 901 (2025)	Register, join PRO/submit plan, pay costs	Register by Jul 1, 2026; producer plan due Jul 1, 2028.
Washington	SB 5284 (2025)	Appoint/join PRO, submit plan	Appoint PRO by Jan 1, 2026; PRO registers Mar 1, 2026; stewardship plan due Oct 2028; rollout by 2030.

California SB 707 (Textiles)

Creates textile EPR for apparel and textile articles, administered by CalRecycle



Covers apparel and textile products



Producers must join/form a PRO; stewardship plans must cover collection, recycling, repair & reuse pathways

Enacted: September 2024

Updates for 2025 & beyond

July 2025:

- California Retailers, AAFA, and National Retail Federation signed a Memorandum of Understanding to jointly establish an independent, 501(c)(3) Producer Responsibility Organization

2026 & beyond

- PRO applications due to CalRecycle by **Jan 1, 2026**
- CalRecycle must approve a PRO by **Mar 1, 2026**
- July 1, 2028:** CalRecycle must adopt implementing regulations for the program
- July 1, 2030:** All producers must operate under an approved stewardship plan or face penalties



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