

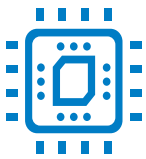


# Mid-Year Review of Global Product Compliance

## 2025

Global  
Outlook. 

## Your webinar questions answered



### Does the definition of “digital electronic product” in Washington State include medical devices?

Washington State’s Right to Repair Act does not specify whether medical devices are in or out of scope; however, it may be of interest to know that on the same day the Governor signed the Act into law, he also enacted SB 5680, a companion right-to-repair measure focused on mobility devices, such as powered wheelchairs: <https://housedemocrats.wa.gov/gregerson/2025/05/20/governor-signs-landmark-right-to-repair-bills-into-law-expanding-consumer-protections-access-to-repairs/>

To me, this suggests that the Right to Repair Act is focused on consumer digital electronic products, such as appliances and mobile phones.

Enhesa Product Intelligence’s Expert Service team is able to contact the State to ask questions about the scope of laws such as these, if you would like to provide more details about your medical devices?



### About the PFAS restrictions in Maine – to fall under a CUU, do you need to file a request?

Yes, Maine’s PFAS law will eventually restrict the intentional addition of the chemical class in most goods by 2032, unless a CUU exemption is granted. Manufacturers may apply for an exemption from 60 months to 18 months prior to a relevant sales ban taking effect.

For more, see Chemical Watch News & Insight: <https://product.enhesa.com/1663379/maine-grants-first-two-product-exemptions-under-pfas-law>



## About ECHA: 8 sectors were added, but they will not be reviewed by RAC/SEAC. What will happen to these 8 sectors in the final ECHA opinion then?

I went back to our News to check on this one!

ECHA's March 2026 public consultation on the socio-economic impacts of its proposed PFAS restriction will permit stakeholders to comment on the draft opinion of the Committee for Socio-Economic Analysis (SEAC), assessing the socio-economic aspects of a restriction under REACH, including the availability of alternatives.

It is unclear what will happen vis the eight sectors added; however, SEAC agency will host an online information session on 30 October, which may shed some light on their planned approach: <https://product.enhesa.com/1630751/echa-plans-march-2026-socio-economic-consultation-on-pfas-restriction-proposal>



## Are we 100% sure the French Fast Fashion Act is in force? I don't believe it is.

I took this news from a recent American Apparel & Footwear Association (AAFA) email newsletter, which indicated:

France's law against fast fashion came into force on 1 October following the expiration of the comment period in Brussels, which will introduce a EUR 5 tax on every fast fashion item sold, which doubles by 2030.

This was supported by a 1 October 2025 article from Ecotextile: <https://www.ecotextile.com/2025100160086/news/legislation/french-fast-fashion-crackdown-goes-live/>



## Regarding SASO RoHS - are the exemptions covered under EU RoHS also covered in the SASO RoHS? For example, is exemption 6c - lead in brass - covered in the new SASO RoHS?

While Saudi RoHS is modeled on EU RoHS, it does not include the same level of complexity regarding the exemptions and derogations: <https://product.enhesa.com/1585689>



## The UK has committed to transitioning away from all avoidable single-use medical technology products by 2045. Are you aware of other countries moving in that direction for medical devices and equipment?

<https://www.gov.uk/government/publications/design-for-life-roadmap/design-for-life-roadmap--4>

I am not aware of other jurisdictions transitioning away from single-use medical technology products; however, I do know that many jurisdictions have restricted or banned single-use plastic and products made from same, including some medical devices, such as cotton bud sticks and hand sanitizers packed in disposable plastic containers.

Our Packaging EPR Tool can help with those, if you're interested: <https://www.enhesa.com/product-intelligence/our-solutions/focused-compliance-solution/packaging-epr-global-regulatory-comparison/>



## **I would like to know what advice Enhesa provides to reduce operator and environmental contamination from concentrated products when dispensing at the point of use.**

This may be a question better answered by our sister business unit, Environmental Health and Safety (EHS) Intelligence: <https://www.enhesa.com/ehs-intelligence/>

I say this because our remit in Product Intelligence is requirements for the products themselves, such as their design, labeling, safety, testing and takeback at the end of their useful life.



## **Significant changes in the regulation of Plant Protection Products are being implemented to include 'Engineering controls to prevent accidental losses of chemicals'. How does this affect the packaging and control of other hazardous materials?**

Unfortunately, plant protection products are outside of the scope of Product Intelligence; however, our EHS Intelligence unit may also be able to support here!

With regard to the news about two corporate executives sentenced to US federal prison for conspiring to defraud the US and for failing to report information about defective dehumidifiers, why were the fines so low?

It is hard to say why the fines were so low, yet the executives were sentenced to prison. I expect there are a combination of factors, including the potential fines established under the Consumer Product Safety Act (CPSA), combined with the Trump administration's determination to penalize Chinese-owned companies.

For more, see: <https://www.justice.gov/usao-cdca/pr/corporate-executives-sentenced-federal-prison-failing-report-defective-dehumidifiers%20%E2%80%8B>



## **Would the execs have been found guilty under the new deregulated rules?**

It is unlikely, because the Trump administration has not moved to deregulate the CPSA and because the lawsuit was with federal courts, whose jurisdiction is separate to those of the agencies, like CPSC, EPA and FDA.

Uzbekistan RoHS, doesn't seem that exemptions fully align with EU RoHS. Are there certification requirements and use of OZS marking?

I agree, while the Decree restricts the same substances as EU RoHS, I don't believe Uzbekistan has adopted all of the exemptions and derogations of EU RoHS.

The Decree requires a Declaration of Conformity or Certification, and products must bear the OZS Conformity Mark.

For more, see: <https://lex.uz/docs/7689910>



## **Is SCIP truly an administrative monster slowing Eope's competitiveness, or is the EU making a mistake by ditching one of its few tools driving a toxic-free circular economy?**

It is hard for me to weigh in on whether SCIP is burdensome or not, as I don't have practical insights into its use, but our journalists are covering the responses to the EU considering ditching SCIP from stakeholders including EU MEPs, industry associations and NGOs, and it appears that most are in favor of keeping SCIP running:

<https://product.enhesa.com/1576304>

<https://product.enhesa.com/1626974>

<https://product.enhesa.com/1634146>

<https://product.enhesa.com/1571423>

More to come, I'm sure!



## Question on latest SDS update rule for Canada based on the new GHS version accepted. Apparently, all Canada SDSs now have to list the particle size of the product - is there confirmation on what is the minimum information legally required to be listed?

This is not my area of expertise, but Health Canada has issued guidance on Workplace Hazardous Materials Information System (WHMIS) requirements, including particle size, which may be of use: <https://www.canada.ca/en/health-canada/services/environmental-workplace-health/occupational-health-safety/workplace-hazardous-materials-information-system/supplier-hazard-communication-requirements-whmis/guidance.html>



## Is there any information regarding EMRT and CMRT?

We don't necessarily cover voluntary reporting schemes, such as the Extended Minerals Reporting Template (EMRT) and Conflict Minerals Reporting Template (CMRT); however, I appreciate the question and will consider expanding to cover them in future presentations!

In the meantime, you can see the latest on each from the Responsible Minerals Initiative (RMI):

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

<https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>



## Ukraine REACH: overview of substances affected?

The Ukrainian Technical Regulation on Chemical Safety is modeled after EU REACH and requires mandatory registration of all chemicals produced, imported and placed on the market in Ukraine in quantities exceeding one ton per year. The intent is to collect information on the properties and safe use of chemicals in the country.

At our recent Regulatory Summit North America, held in Washington, DC, in September, Lucy Wang, of CIRS, covered the implementation of Ukraine REACH. This video may be of interest and her slides are accessible, too: <https://product.enhesa.com/1661010>



## Stay compliant with Enhesa Product Intelligence

At Enhesa Product Intelligence, we empower global businesses to navigate the fast-changing product compliance landscape. Through our powerful intelligence, data tools and analyst support, businesses make safer, more compliant products and can ensure market access for their products worldwide.

[Learn more](#)

Empowering businesses  
to create a more  
sustainable future.