#### THE INTERNATIONAL CADMIUM ASSOCIATION

**REGULATORY UPDATE**

**July 28, 2019**[[1]](#footnote-1)

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**FEDERAL ISSUES**

**CERCLA ISSUES**

**Court Denies Petition Seeking Review Of EPA’s Decision Not To Issue Financial Responsibility Requirements For Hardrock Mining Industry**

On July 19, 2019, the U.S. Court of Appeals for the District of Columbia Circuit denied an NGO petition seeking review of EPA’s decision not to issue a final rule establishing financial responsibility requirements for the hardrock mining industry. *Idaho Conservation League v. Wheeler*, No. 18-1141. The NGOs argued that by deciding not to issue a final rule, EPA ignored “significant” risks posed by other mines. EPA maintained that issuing a final rule requiring hardrock mining companies to show they have set aside funding to clean up contamination at mining sites would have been “arbitrary and capricious.” The court states that because CERCLA Section 9608(b)’s use of “risk” in the general mandate and amount clauses is ambiguous and EPA’s interpretation is reasonable, it defers to EPA’s interpretation that it should set financial responsibility regulations based on financial risks, not risks to health and the environment. According to the court, nothing in Section 9608(b) mandates EPA to promulgate financial responsibility requirements for the hardrock mining industry, authorizing EPA to decline to do so. The court states that it is “unpersuaded” by the NGOs’ argument that EPA arbitrarily and capriciously ignored certain financial risks and that it supported its Final Action with a faulty economic analysis.

**MINING AND MINERAL ISSUES**

**Commerce Department Releases Federal Strategy On Critical Minerals**

On June 4, 2019, the Commerce Department [announced](https://www.commerce.gov/news/press-releases/2019/06/department-commerce-releases-report-critical-minerals) the release of [*A Federal Strategy to Ensure Secure and Reliable Supplies of Critical Minerals*](https://www.commerce.gov/sites/default/files/2019-06/Critical%20minerals%20strategy%20final.docx). The report contains a government-wide action plan, including recommendations to advance research and development efforts, increase domestic activity across the supply chain, streamline permitting, and grow the American critical minerals workforce. It includes the following calls to action:

* **Advance Transformational Research, Development, and Deployment Across Critical Mineral Supply Chains**: Assesses progress toward developing critical minerals recycling and reprocessing technologies, technological alternatives to critical minerals, source diversification, and improving processes for critical mineral extraction, separation, purification, and alloying.
* **Strengthen America’s Critical Mineral Supply Chains and Defense Industrial Base**: Discusses ways to improve critical mineral supply chains, which could help reduce risks to U.S. supply by increasing domestic critical mineral resource development, building robust downstream manufacturing capabilities, and ensuring sufficient productive capacity.
* **Enhance International Trade and Cooperation Related to Critical Minerals**: Identifies options for accessing and developing critical minerals through investment and trade with U.S. allies, discusses areas for international collaboration and cooperation, and ensures robust enforcement of U.S. trade laws and international agreements that help address adverse impacts of market-distorting foreign trade conduct.
* **Improve Understanding of Domestic Critical Mineral Resources**: Provides a plan to: improve and publicize the topographical, geological, geophysical, and bathymetrical mapping of the U.S.; support mineral information collection and analysis of commodity-specific mitigation strategies; focus and prioritize interagency efforts; and conduct critical mineral resource assessments to support domestic mineral exploration and development of conventional sources (minerals obtained directly through mining an ore), secondary sources (recycled materials, post-industrial, and post-consumer materials), and unconventional sources (minerals obtained from sources such as mine tailings, coal byproducts, extraction from seawater, and geothermal brines) of critical minerals.
* **Improve Access to Domestic Critical Mineral Resources on Federal Lands and Reduce Federal Permitting Timeframes**: Provides recommendations to streamline permitting and review processes related to developing mining claims or leases and enhancing access to domestic critical mineral resources.
* **Grow the American Critical Minerals Workforce**: Discusses the activities related to critical minerals needed to develop and maintain a strong domestic workforce to foster a robust domestic industrial base.

On May 18, 2018, DOI published a [*Federal Register* notice](https://www.federalregister.gov/documents/2018/05/18/2018-10667/final-list-of-critical-minerals-2018) announcing its final list of 35 critical minerals. **Cadmium** is not included.

**NIOSH Reopens Comment Period To Inform Prioritization Of Research Regarding Mining Automation And Safety**

As reported in our March 28, 2019, Update, NIOSH published a [*Federal Register* notice](https://www.federalregister.gov/documents/2019/03/18/2019-04926/mining-automation-and-safety-research-prioritization) on March 18, 2019, requesting information to inform the prioritization of research to be undertaken by the NIOSH Mining Program. NIOSH seeks input on priority gaps in knowledge regarding the safety and health implications of humans working with automated equipment and associated technologies in mining, with an emphasis on worker safety and health research in which NIOSH has the comparative advantage, and is unlikely to be undertaken by other federal agencies, academia, or the private sector. On June 24, 2019, NIOSH announced that in response to a request from an interested party, it is reopening the comment period. Comments are due **August 23, 2019**. More information on NIOSH’s request for information is available in our March 28, 2019, Update.

**TRADE ISSUES**

**USTR Increases Tariffs To 25 Percent, Establishes Process To Request Exclusions**

On May 9, 2019, USTR published a [*Federal Register* notice](https://www.federalregister.gov/documents/2019/05/09/2019-09681/notice-of-modification-of-section-301-action-chinas-acts-policies-and-practices-related-to) announcing that it has determined to increase the rate of additional duty from ten percent to 25 percent for the products of China covered by the [September 2018 action](https://ustr.gov/about-us/policy-offices/press-office/press-releases/2018/september/ustr-finalizes-tariffs-200) in its investigation. The increase took effect May 10, 2019. As reported in our September 28, 2018, Update, the final list includes the following **cadmium** products:

| **HTSUS Subheading** | **Product Description** |
| --- | --- |
| 2620.91.00 | Ash and residues (other than from the manufacture of iron or steel), containing antimony, beryllium, **cadmium**, chromium, or their mixtures |
| 2825.90.75 | **Cadmium oxide** |
| 2830.90.20 | **Cadmium sulfide** |
| 8107.20.00 | **Cadmium, unwrought; cadmium powders** |
| 8107.30.00 | **Cadmium waste and scrap** |
| 8107.90.00 | **Cadmium, articles thereof nesoi** |
| 8507.30.40 | **Nickel-cadmium storage batteries**, of a kind used as the primary source of electrical power for electrically powered vehicles of 8703.90 |

On June 24, 2019, USTR published a [*Federal Register* notice](https://www.federalregister.gov/documents/2019/06/24/2019-13376/procedures-for-requests-to-exclude-particular-products-from-the-september-2018-action-pursuant-to) announcing that it will open an electronic portal for submission of exclusion requests on June 30, 2019, and setting out the procedures for submitting requests. Responses to individual exclusion requests are due 14 days after the request is posted on USTR’s online portal. Any replies to responses to an exclusion request are due the later of seven days after the close of the 14-day response period, or seven days after the posting of a response. The deadline for submitting exclusion requests is **September 30, 2019**.

**MISCELLANEOUS ISSUES**

**U.S. Seeks Public Comments On Positions To Be Discussed At 42nd Session Of The Codex Alimentarius Commission**

On July 2, 2019, the U.S. Codex Office published a [*Federal Register* notice](https://www.federalregister.gov/documents/2019/07/02/2019-14076/international-standard-setting-activities) seeking comments on standards under consideration and recommendations for new standards. According to the notice, items on the agenda for the 42nd Session of the Codex Alimentarius Commission, convened on July 8-12, 2019, include:

* To be considered for final adoption at Step 5/8:
* Proposed draft ML for **cadmium** in chocolates containing or declaring <30% total cocoa solids on a dry matter basis.
* To be considered for approval as new work:
* Development of a code of practice for the prevention and reduction of **cadmium** contamination in cocoa beans.
* The CCCF will continue to discuss the following items:
* Establishment of MLs for **cadmium** in chocolate and chocolate products containing or declaring ≥30% to <50% total cocoa solids on a dry matter basis; and cocoa powder (100% total cocoa solids on a dry matter basis); and
* Discussion paper on lead and **cadmium** in quinoa.

**EPA Publishes Part 1 Of Report On Tire Crumb Rubber Characterization**

On July 25, 2019, EPA published a [*Federal Register* notice](https://www.federalregister.gov/documents/2019/07/25/2019-15761/availability-of-synthetic-turf-field-recycled-tire-crumb-rubber-research-under-the-federal-research) announcing the release of [Part 1 of a new report](https://www.epa.gov/chemical-research/july-2019-report-tire-crumb-rubber-characterization-0) that addresses exposure to tire crumb rubber on synthetic turf fields. The objective of the effort to characterize tire crumb rubber material was to identify and collate toxicity reference information on potential chemical constituents of tire crumb rubber from existing on-line databases and literature sources. EPA notes that the report “is not a risk assessment, nor can the information be used to identify a level above which health effects could occur.” According to EPA, in general, the findings support the premise that while chemicals are present as expected in the tire crumb rubber, human exposure appears to be limited based on what is released into air or simulated biological fluids. Part 1 of the report presents results of the tire crumb rubber characterization research (*i.e*., what is in tire crumb rubber). Some major classes of constituents identified in the literature include inorganics and VOCs/SVOCs. Frequently studied inorganics include lead, zinc, **cadmium**, and chromium. EPA states that Part 2 will be released at a later date.

**STATE ISSUES**

***D.C.***

**D.C. Proposes To Update Aquatic Life Criteria For Cadmium**

On June 28, 2019, DOEE published a second proposed rulemaking to update the aquatic life criteria for ammonia and **cadmium**, and 94 human health criteria. The notice states:

The proposed update to the aquatic life criteria for **cadmium** is also based on EPA recommendations, the 2016 Aquatic Life Ambient Water Quality Criteria - **Cadmium** (EPA 820-R-16-002). Chronic **cadmium** exposure can lead to adverse effects in the growth, reproductive, immune, and endocrine systems of aquatic life. **Cadmium** is, however, a naturally occurring metal found in mineral deposits and distributed ubiquitously at low concentrations in the environment. The updated chronic criterion is less stringent than the current chronic criterion, while the acute is more stringent.

***Nevada***

**Governor Signs Bill Designating Cadmium As Known Carcinogen Reasonably Associated With Lung Cancer**

Governor Steve Sisolak (D) signed S.B. 215 on June 12, 2019. The bill amends the statutory provisions governing compensation for certain employees who develop cancer as an occupational disease. Under the bill, several chemicals, including **cadmium**, are “deemed to be known carcinogens that are reasonably associated with lung cancer.” The amendments apply only to claims filed on or after July 1, 2019.

***New Jersey***

**Assembly Bill Would Prohibit Sale Of Jewelry Containing Cadmium**

A.B. 5593, introduced on June 17, 2019, would prohibit the sale, distribution, and manufacture of jewelry containing more than 0.03 percent **cadmium** by weight. Under the bill, the Director of Consumer Affairs or any manufacturer, distributor, or importer of jewelry who discovers that a type of jewelry contains more than 0.03 percent **cadmium** by weight would have to issue an immediate recall for that type of jewelry. Within 48 hours of receiving notice of the recall, retail mercantile establishments would be required to remove the jewelry from displays and make it unavailable for purchase.

**Senate Bill Would Include Cadmium On List Of Dangerous Chemicals**

S.B. 4026, introduced on June 24, 2019, would require NJDEP to post on its website a list of dangerous chemicals and a list of chemicals of concern; require manufacturers of children’s products to report use of listed chemicals; and prohibit the sale and distribution of children’s products containing certain chemicals. The list of dangerous chemicals includes **cadmium**, and the list of chemicals of concern includes **cadmium** and **cadmium compounds**.

***Vermont***

**Governor Signs Bill To Create Interagency Committee On Chemical Management**

Governor Phil Scott (R) signed a bill (S. 55) on June 19, 2019, that will establish an Interagency Committee on Chemical Management to evaluate chemical inventories in Vermont and identify potential risks from the inventories. The bill requires a manufacturer of a children’s product containing a chemical of high concern to children to report the brand name, product model, and available universal product code of a product. The list of chemicals of high concern to children includes **cadmium** and **cadmium compounds**.

**INTERNATIONAL ISSUES**

**AUSTRALIA**

**SWA Seeks Feedback On Adopting GHS 7 Under Model WHS Laws**

SWA began a [public consultation](https://engage.swa.gov.au/adopt-updated-ghs-under-the-model-whs-laws) on July 3, 2019, on a proposal to adopt an updated edition of the GHS for workplace hazardous chemicals. Since January 1, 2017, the third revised edition of the GHS has been implemented under the model WHS laws. According to SWA, as Australia’s transition to the GHS is now complete, it is time to move beyond the third GHS to ensure Australia’s classification and labeling requirements for workplace chemicals are aligned with its key trading partners as they move to the seventh revised edition of the GHS. SWA has posted the following supporting documents:

* [GHS 7 Consultation paper](https://engage.swa.gov.au/47132/documents/108975);
* [Precautionary statements comparison GHS 3 to GHS 7 - Physical hazards](https://engage.swa.gov.au/47132/documents/108961);
* [Precautionary statements comparison GHS 3 to GHS 7 - Health hazards](https://engage.swa.gov.au/47132/documents/108962); and
* [Table of amendments from GHS 3 to GHS 7](https://engage.swa.gov.au/47132/documents/108964).

Comments were due July 28, 2019.

**Australia Publishes Schedule For Release Of Draft Recommendations On Workplace Exposure Standards For Airborne Contaminants, Including Cadmium And Compounds**

SWA is evaluating Australia’s workplace exposure standards for airborne contaminants “to ensure they are based on the highest quality, contemporary evidence and supported by a rigorous scientific approach.” SWA intends to publish draft evaluation reports and recommendations for each chemical for public comment throughout **2019-2020**. SWA has posted the [anticipated schedule](https://www.safeworkaustralia.gov.au/release-schedule-review-workplace-exposure-standards#schedule-of-releases) for public comment. Release group 13, scheduled for release on **September 13, 2019**, will include **cadmium and compounds**.

**CANADA**

**Canada Begins Public Consultation On Integrated Strategy For Protection Of Canadian Workers From Exposure To Chemicals**

On July 11, 2019, Canada began a [public consultation](https://www.canada.ca/en/health-canada/services/chemical-substances/consulting-future-chemicals-management-canada.html) on an [integrated strategy for the protection of Canadian workers from exposure to chemicals](https://www.canada.ca/en/health-canada/programs/consulting-integrated-strategy-protection-canadian-workers-exposure-chemicals.html). The intent of the consultation is to obtain comments on how Health Canada can enhance the protection of Canadian workers from exposure to chemicals. Canada states that while CEPA is broad in scope, occupational exposure has not been included in risk assessments or risk management carried out under CMP. Canada notes that “[t]his is a departure from the practices of most other international chemicals management agencies, where occupational exposure is often the driver for risk management.” WHMIS currently operates in parallel with CMP, but Canada acknowledges that “there is very little integration between the two programs.” Canada is exploring ways to modernize chemicals management in Canada. Health Canada recognizes that enhancing the protection of Canadians from exposure to chemicals in the workplace is a “key area of interest for stakeholders,” and is exploring ways to integrate better WHMIS and CMP. Canada has identified two potential actions that may help to enhance worker protection in relation to their exposure to chemicals of concern:

* Establish an FPT Committee to coordinate better chemicals management for the protection of workers; and
* Integrate the federal management of the WHMIS Program under CMP.

Comments are due **August 30, 2019**.

**CHINA**

**China Intends To Issue National Standards Related To Toys And Children’s Products**

On May 31, 2019, the State Administration of Markets [announced](http://www.samr.gov.cn/xw/zj/201905/t20190531_301983.html) that it intends to issue a number of national standards together with the National Standardization Administration. Some of the national standards will be closely related to children, including toys and children’s products. The standards will include the National Standard for the General Rules for the Migration of Specific Elements in Toys and Children’s Products, which will provide new test methods for determining the migration limits of specific elements from these products during use and when in contact with skin.

**Trial Policy Allows Governments To Sue For Environmental Damages**

The Supreme People’s Court announced in June 2019 that it is implementing a trial policy that gives provincial and city governments the authority to sue companies for environmental damages. The policy, which took effect June 5, 2019, allows the governments to file lawsuits for the costs in major environmental cases, such as oil or chemical spills. On June 12, 2019, a spokesperson for the People’s Procuratorate of Quangang, District of Quanzhou, stated that prosecutors may use the trial policy to pay for the cleanup of the November 2018 leak of a solvent at the port city of Quanzhou.

**China Issues Rules Concerning Environmental Inspectors**

The Communist Party Central Committee and the State Council released [rules](http://www.gov.cn/zhengce/2019-06/17/content_5401085.htm) on June 17, 2019, that significantly expand the power of the central government’s environmental inspectors. Inspectors can now subject ministries and state-owned enterprises to scrutiny over whether they are following environmental laws and regulations. While the rules expand the power of environmental inspectors, the rules also allow businesses and local communities to report inspectors who are too harsh or exceed their authority.

**China Accepting Nominations Of Existing Chemical Substances To IECSC**

On June 21, 2019, MEE issued a notice on supplementing and improving the IECSC. According to the notice, chemical substances that were legally produced in or imported into China before October 15, 2003, but that are not on the IECSC, except for the substance categories exempted from the “Environmental Management of New Chemical Substances” (MEP Order No. 7), could be added to the IECSC. Manufacturers, importers, users, and relevant trade associations/institutions can submit an application with relevant supporting documents to the MEE before **September 30, 2019**. More information is available in Acta®’s June 27, 2019, memorandum, “[China Accepting Nominations of Existing Chemical Substances to Existing Chemical Inventory](https://www.lawbc.com/regulatory-developments/entry/china-accepting-nominations-of-existing-chemical-substances-to-existing-che).”

**Environmental Inspections Will Target State-Owned Enterprises, Including China Minmetals**

MEE [announced](https://mp.weixin.qq.com/s/jPwBwfBsNUyT1Ta3bQ1Fhg) on July 8, 2019, that it will focus environmental inspections on two major state-owned enterprises -- mining and metals trading company China Minmetals Corp. and chemical producer China National Chemical Corp. Ltd. The investigations are expected to target primarily subsidiaries of the two companies. Inspections will also be conducted in the state-level municipalities of Shanghai and Chongqing, and the provinces of Fujian, Hainan, Gansu, and Qinghai, so industries in these areas may experience some disruptions. According to MEE, the inspections will include examining company decision-makers. A database of corporate environmental infractions announced by environmental authorities and compiled by the Institute of Public and Environmental Affairs shows 21 recent violations for China Minmetals and its subsidiaries, and 160 recent violations for ChemChina and its subsidiaries.

**China Begins Public Consultation On Draft Revision To MEP Order No. 7**

On July 9, 2019, MEE announced a public consultation on a draft revision to the “Environmental Management of New Chemical Substances” (MEP Order No. 7). The draft revision would reduce some registration burdens for new chemical substances, particularly for new chemical substances without PBT potential and with annual production or import volume of less than ten metric tons. The key provisions include:

* New chemical substances used for research with annual production or import volumes of less than 100 kg are excluded;
* New chemical substances with annual production or import volumes of less than one metric ton and polymers with less than two percent of new chemical monomer or polymers of low concern will only require a record filing;
* Regular registration is required only for new chemical substances with annual production or import volumes of ten metric tons and above. New chemical substances with annual production or import volumes of one to ten metric tons will only file a simplified registration, which does not require that toxicological tests related to health hazards be conducted. PBT substances will not be eligible for the simplified registration;
* New chemical substances with regular registration will be included on the IECSC after five years and PBT substances will include a use restriction;
* PBT substances on the IECSC with a use restriction will require new use registration; and
* Annual reporting will only be required for regular registration and the report date is changed from February 1 to April 30 each year.

Comments are due **August 16, 2019**. More information is available in Acta’s July 12, 2019, memorandum, “[China Begins Public Consultation on Draft Revision to MEP Order No. 7](https://www.actagroup.com/regulatory-developments/entry/china-begins-public-consultation-on-draft-revision-to-mep-order-no.-7).”

**EGYPT**

**Egypt Intends To Adopt Updated Toy Standards By The End Of 2019**

The Organization for Standards and Quality is in the process of updating Egypt’s toy standards with new migration limits for 19 substances, including **cadmium**. The standards cover toys with a “reasonable risk” of being put into a child’s mouth. These include those intended for use close to or inside the mouth, such as cosmetics, writing implements classified as toys, and all toys or parts of toys aimed at children under six-years-old. The draft standard complies with European and ISO standards, but sets lower migration limits for barium, **cadmium**, and lead than those in the EU Toy Safety Directive. The other limits are the same. It divides toy materials into three categories:

* Type one: Solid coloring instruments, such as crayons or chalk, as well as malleable or shaping materials, such as moldable clay;
* Type two: Liquid paints or liquid ink in pens, as well as glue sticks; and
* Type three: Toys made from other materials, including paper or cardboard, polymers, textiles and wood, and glass and metals, as well as coatings.

The draft standard includes:

|  |  |  |  |
| --- | --- | --- | --- |
| **Element Name** | **Type 1 (mg/kg)** | **Type 2 (mg/kg)** | **Type 3 (mg/kg)** |
| **Cadmium** | 1.3 | 0.3 | 17 |

A spokesperson for the Organization for Standards and Quality states that it intends to adopt the updated standards by the **end of 2019**.

**JAPAN**

**Japan Issues Revised GHS Standards**

In May 2019, Japan revised its GHS standards -- [JIS Z 7252](https://webdesk.jsa.or.jp/books/W11M0090/index/?bunsyo_id=JIS+Z+7252:2019) for classification and [JIS Z 7253](https://webdesk.jsa.or.jp/books/W11M0090/index/?bunsyo_id=JIS+Z+7253:2019) for SDSs. The revised standards are intended to align Japan’s requirements with the sixth edition of the GHS. Chemical suppliers have until **May 24, 2022**, to adopt the requirements of the new standards and update their SDSs and labels if necessary.

**PHILIPPINES**

**PDOH Cautions Parents Not To Buy Toxic School Supplies**

PDOH [published a warning](https://www.doh.gov.ph/node/17433) on June 6, 2019, warning parents not to buy toxic school supplies. According to the warning, last year some school products were found to contain unacceptable levels of heavy metals, including **cadmium**. The warning cites CPSC, stating that it found that “[l]ong-term exposure from inhalation of **cadmium** may result [in] chronic obstructive pulmonary diseases, emphysema, [and] chronic kidney diseases.” PDOH urges parents to be cautious when buying school supplies for their children; carefully read the labels to know if the product is appropriate for children and registered with PFDA for safety, and immediately consult a doctor in cases of accidental ingestion or any adverse health effects while using school supplies.

**SOUTH KOREA**

**MOE Publishes K-REACH Guidance In English**

MOE published [guidance](https://www.lawbc.com/uploads/docs/4Jl9gsag.pdf) recently, in English, on K-REACH as amended on January 1, 2019. The guidance covers:

* The scope of K-REACH;
* Registration or notification of chemical;
* Exemption from registration or notification of chemical substances;
* Information provision;
* Notification of substances subject to intensive control and notification of products containing intensive control chemicals;
* Overseas manufacturers and procedures for ARECs (K-REACH) compliance; and
* Other matters.

\* \* \* \* \*

Unless otherwise noted, if you have questions about any item summarized above, please call or e-mail Lynn L. Bergeson at (202) 557-3801 or [lbergeson@lawbc.com](mailto:lbergeson@lawbc.com), or Carla N. Hutton at (202) 557-3809 or [chutton@lawbc.com](mailto:chutton@lawbc.com).

## ACRONYMS

**Acta** -- The Acta Group

**ARECs** -- Act on Registration, Evaluation, etc. of Chemicals

**CCCF** -- Codex Committee on Contaminants in Foods

**CEPA** -- Canadian Environmental Protection Act, 1999

**CERCLA** -- Comprehensive Environmental Response, Compensation, and Liability Act

**CMP** -- Chemicals Management Plan

**CPSC** -- United States Consumer Product Safety Commission

**DOEE** -- Department of Energy and Environment

**DOI** -- United States Department of the Interior

**EPA** -- United States Environmental Protection Agency

**EU** -- European Union

**FPT** -- Federal, Provincial, and Territorial

**GHS** -- Globally Harmonized System of Classification and Labeling of Chemicals

**HTSUS** -- Harmonized Tariff Schedule of the United States

**ICdA** -- International Cadmium Association

**IECSC** -- Inventory of Existing Chemical Substances in China

**ISO** -- International Organization for Standardization

**JIS** -- Japanese Industrial Standard

**kg** -- Kilogram

**K-REACH** -- Act for the Registration and Evaluation of Chemicals

**MEE** -- Ministry of Ecology and Environment

**MEP** -- Ministry of Environmental Protection

**mg/kg** -- Milligram Per Kilogram

**ML** -- Maximum Level

**MOE** -- Ministry of the Environment

**NGO** -- Non-Governmental Organization

**NIOSH** -- National Institute for Occupational Safety and Health

**NJDEP** -- New Jersey Department of Environmental Protection

**PBT** -- Persistent, Bioaccumulative, and Toxic

**PDOH** -- Philippines Department of Health

**PFDA** -- Philippines Food and Drug Administration

**SDS** -- Safety Data Sheet

**SVOC** -- Semivolatile Organic Compound

**SWA** -- Safe Work Australia

**USTR** -- Office of the United States Trade Representative

**VOC** -- Volatile Organic Compound

**WHMIS** -- Workplace Hazardous Materials Information System

**WHS** -- Work Health and Safety

1. This Update addresses significant federal, state, and international environmental and occupational safety and health regulatory issues and ongoing advocacy efforts pertinent to the ICdA member companies. A list of acronyms used in this Update is provided. [↑](#footnote-ref-1)