

JULY 14, 2026

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GENERAL ISSUES OF INTEREST TO THE CCB:

Taiwan Promulgates Resource Circulation Promotion Act

- On June 17, Taiwan's President promulgated the Resource Circulation Promotion Act (both in Chinese), completing the legislative process for amendments that were approved by the Taiwanese Gazette in April (*BCI Monitor* 6-3-25, 6-24-25, 5-5-26). The Act renames and substantially expands the former *Resource Recycling and Reuse Act* and establishes a full lifecycle approach to resource management.
- Based on machine translation, key provisions of potential interest include the following:
- Green Design (Articles 13-14): The central authority must establish green design principles covering material selection, use of recycled content, repairability, durability, and restrictions on hazardous substances. Authorities may designate specific product categories that must comply with green design criteria, with manufacturers and importers required to apply for certification and a "Circular Label." Compliance with green design requirements for designated products is mandatory; other manufacturers and importers may comply voluntarily.
- Packaging Reduction and Reuse (Articles 16-19): Authorities may set reuse and reduction targets for products and their packaging and containers, requiring manufacturers, importers, and sellers of designated items to submit reuse and reduction plans and report results. Packaging that is excessively resource-intensive, contains long-lasting or hazardous components, is difficult to recycle, or poses serious environmental risk may be prohibited or restricted. Authorities may also set targets for transport and retail packaging covering space ratios, number of layers, and material types.
- Product Information Disclosure (Article 22): For designated products and their packaging, manufacturers, importers, and sellers must disclose and label information including material type and recycled content ratio, packaging material and weight, repairability and durability, and recycling and disassembly instructions. Voluntary disclosure is permitted for non-designated products.
- Extended Producer Responsibility (Article 26): Authorities may require manufacturers, importers, sellers, or users of certain packaging and containers to jointly establish or join a producer responsibility organization responsible for the financial and practical execution of collection, removal, and recycling.
- Green design requirements and their associated penalties will enter into force two years after promulgation; all other provisions took effect upon promulgation on June 17, 2026. Specific implementing regulations have yet to be published.

EU Partial Enforcement of Ban on BPA Use in Food Contact Materials

- On July 20, sections of the European Union's (EU) Commission Regulation (EU) 2024/3190 on the use of bisphenol A (BPA) and other bisphenols in certain materials and articles intended to come into contact with food (Guidelines), amending *Regulation (EU) No 10/2011* and repealing *Regulation (EU) 2018/213*, will be enforced (*BCI Monitors* 12-23-24, 2-11-25, 1-13-26).

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EU Partial Enforcement of Ban on BPA Use in Food Contact Materials (cont.)

- As previously reported, article 3 prohibits the use of BPA and its salts in the manufacture and placing on the EU market of the following food contact materials (FCMs): adhesives, rubbers, ion-exchange resins, plastics, printing inks, silicones, and varnishes and coatings. Article 3(2) allows BPA and its salts to be used in the manufacture of FCMs for a specific application as set out in Annex II.
- Article 4 prohibits food contact materials that have been manufactured using other bisphenol or bisphenol derivatives from containing any residual BPA.
- Article 5 prohibits the use of hazardous bisphenols other than BPA or hazardous bisphenol derivatives in the manufacture and placing on the EU market of the FCMs listed above. Article 5(2) allows hazardous bisphenols other than BPA or hazardous bisphenol derivatives to be used in the manufacture of FCMs for a specific application as set out in Annex II and in accordance with Article 6.
- Other bisphenols and bisphenol derivatives listed in Annex VI Part 3 of *Regulation (EC) No 1272/2008* are also prohibited from being placed on the EU market, unless the conditions listed in Article 5 are fulfilled.
- Articles 7-9 outline the BPA monitoring and reporting requirements manufacturers must follow to place the FCMs on the EU market.
- The regulation entered into force on January 20, 2025, with a two-year transition period for most FCMs containing BPA. From July 20, 2026, the following products containing BPA are prohibited from being placed on the EU market:
 - Single-use final food contact articles manufactured using BPA.
- Final FCMs lawfully placed on the market before the end of the applicable transition period can be sold until stocks are exhausted.
- The U.S. Department of Agriculture Foreign Agricultural Service (USDA FAS) also published a [GAIN Report](#) providing a summary of the regulation.