LEGISLATION UPDATE

October 2025

Introduction and disclaimer

The main legal texts published between the 1st and 31st of October are listed below, separated by main area of work: Quality, Environment, Information Security and Health & Safety.

The legal texts identified in this Newsletter do not represent all the legislation published in relation to these 4 topics. AvISO Consultancy selects the legislation which it believes will apply to the Companies with which it works. In addition, AvISO Consultancy does not take responsibility for the accuracy of any information provided and would recommend that you take appropriate legal advice in relation to any new legislation which might apply to your business, as appropriate.

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For any enquiries related to the legal register, including but not limited to clarifications on legislative changes, guidance on applicability to your organisation, assistance with updating your legal register, adding legislation and guidance to the legal register, or any other related support, please contact legalregister.support@avisoconsultancy.co.uk.

INFORMATION SECURITY	
Data (Use and Access) Act 2025	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: United Kingdom

Effective Date: 1 November 2025 (phased implementation through to 2028)

Amends: UK GDPR, Data Protection Act 2018, PECR

Legislation Type: Information Security / Data Governance / Digital Regulation

Summary

The Data (Use and Access) Act 2025 enters its first statutory phase on 1 November 2025, marking a significant shift in the UK's approach to data governance. The Act establishes a legal framework for the ethical, secure, and fair use of data across public and private sectors. It introduces:

- Mandatory data-sharing obligations for public authorities
- Government-accredited Trusted Data Environments (TDEs)
- Algorithmic transparency requirements
- A new regulator: the Office for Data Stewardship (ODS)

The Act aims to unlock the value of data for public benefit while embedding privacy, transparency, and cybersecurity safeguards. It forms a core component of the UK's National Data Strategy.

Key obligations

For public sector bodies and data holders

- **Trusted Data Environment (TDE) participation:** From April 2026, public authorities must submit prescribed datasets (e.g. health, transport, education, energy) to government-accredited TDEs. These environments must meet ISO/IEC 27001-aligned standards for encryption, access control, and auditability.
- **Data access requests:** Public bodies must respond to approved requests for data access from researchers, regulators, and innovators. Access is subject to strict safeguards, including pseudonymisation, purpose limitation, and proportionality tests.
- **Governance updates:** Internal data governance frameworks must be updated to reflect new access approval workflows and reporting duties.

For private sector data controllers

- **High-value dataset designation (voluntary):** Certain datasets (e.g. mobility, financial, consumer behaviour) may be designated as high-value for public interest use. Participation is voluntary but incentivised through liability protections and R&D tax credits.

- **Algorithmic transparency:** From July 2027, organisations using shared public data in automated decision-making must disclose:
    - Algorithmic logic
    - Data inputs
    - Audit mechanisms
    - Impact assessments
- **Opt-in frameworks:** From January 2027, private entities may opt into the TDE framework to share or access high-value datasets.

For the Office for Data Stewardship (ODS)

- Formally established in Q1 2026
- Full enforcement powers from November 2027
- Responsible for:
    - Accrediting TDEs
    - Monitoring compliance
    - Issuing guidance
    - Conducting audits and investigations

Phased implementation timeline

- **October 2025**: Final guidance issued on TDE accreditation and dataset eligibility
- **1 Nov 2025**: Act enters into force – legal basis for TDEs and ODS established
- **April 2026**: First public sector datasets submitted to TDEs
- **Q2–Q3 2026**: Wider onboarding for education, energy, housing, and local authorities
- **Jan 2027**: Private sector opt-in begins for high-value datasets
- **July 2027**: Algorithmic transparency obligations enforced
- **Dec 2028**: Statutory review of the Act’s effectiveness

Impact

- **Data accessibility**: Enables lawful, secure sharing of high-value datasets for research, innovation, and public service delivery
- **Governance and oversight**: Establishes a centralised regulator to ensure accountability and consistency
- **Innovation and trust**: Supports data-driven innovation while maintaining public confidence in data use
- **Compliance pressure**: Public bodies must act now to identify qualifying datasets and prepare for TDE onboarding

Online Safety Act 2023	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: United Kingdom

Effective Date: Staggered from March 2025 – ongoing through 2026

Legislation Type: Information Security / Child Protection / Online Safety

Amends: New primary legislation

Summary

The Online Safety Act 2023 (OSA) continues its phased implementation, with several key duties now in force and enforcement activity accelerating. The Act imposes legal obligations on online platforms, search engines, and user-to-user services to protect users—particularly children—from illegal and harmful content. Ofcom, the designated regulator, has issued multiple Codes of Practice and guidance documents, and is actively investigating non-compliance.

October 2025 marks a critical point in the rollout, with new consultations, enforcement actions, and the publication of transparency and categorisation guidance. The Act applies to all in-scope services accessible to UK users, regardless of where the provider is based.

Key obligations

For all regulated online services

- **Illegal content duties:** In force since March 2025. Platforms must assess and mitigate risks of illegal content, including terrorism, child sexual exploitation, fraud, and harassment.
    - **Action**: Conduct and document risk assessments; implement proportionate safety measures.
- **Child safety duties:** In force since July 2025. Platforms must use effective age assurance to prevent children from accessing pornography and other harmful content (e.g. self-harm, eating disorders, hate speech).
    - **Action**: Deploy age verification/estimation tools; restrict access to high-risk content; provide clear reporting mechanisms for children and parents.
- **Transparency reporting:** Final guidance published July 2025. Large platforms must publish annual transparency reports detailing risk assessments, safety measures, and enforcement outcomes.
    - **Action**: Prepare internal reporting systems to meet Ofcom's format and frequency requirements.
- **Information requests and preservation:** From September 2025, Ofcom may issue Data Preservation Notices (DPNs) to prevent deletion of a child's online data following their death, supporting coroner investigations.
    - **Action**: Review data retention policies and ensure readiness to comply with DPNs.

Enforcement update

- As of October 2025, Ofcom has launched five enforcement programmes and opened 69 investigations into platform compliance.
- Recent actions include:
    - A £20,000 fine for failure to respond to statutory information requests.
    - Investigations into 22 pornography websites for non-compliance with age-check rules.
    - Monitoring of services attempting to geoblock UK users to avoid regulation.
    - Enforcement of perceptual hash-matching technology to detect and remove child sexual abuse material (CSAM).

Implementation timeline (as of October 2025)

- **March 2025:** Illegal Content Codes of Practice in force
- **July 2025:** Child Safety Codes of Practice in force
- **September 2025:** Data Preservation Notice powers commence
- **October 2025:** Consultation on Coroner Information Notices and DPN guidance
- **Q4 2025:** Final guidance on VAWG (Violence Against Women and Girls) expected
- **Late 2025:** Finalisation of categorised services register (delayed due to legal challenge)
- **2026:** Enforcement of additional duties for Category 1 and 2 services begins

Impact

- **Legal risk**: Non-compliance may result in fines of up to £18 million or 10% of global turnover, and potential criminal liability for senior managers.
- **Operational change**: Platforms must embed safety-by-design principles, age assurance, and content moderation into their core systems.
- **Public accountability**: Transparency reporting and enforcement updates increase reputational exposure for non-compliant services.
- **Sector-wide relevance**: Applies to social media, messaging apps, forums, search engines, video-sharing platforms, and any service enabling user interaction.

National Security Act 2023 (Foreign Influence Registration) Regs 2025	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: United Kingdom

Effective Date: 30 October 2025

Amends: National Security Act 2023

Legislation Type: National Security / Transparency / Corporate Governance

Summary

The Foreign Influence Registration Scheme (FIRS), introduced under Part 4 of the National Security Act 2023, is now operational following the enactment of the Foreign Influence Registration Regulations 2025. The scheme is designed to increase transparency around foreign state-linked influence in UK political and governmental processes.

The Regulations set out the procedural and administrative framework for registration, exemptions, enforcement, and penalties. They apply to individuals and entities undertaking political influence activities in the UK on behalf of a foreign power or foreign-related entity.

Key obligations

For individuals and organisations acting on behalf of foreign powers

- **Mandatory registration:** Any person or organisation undertaking political influence activities in the UK at the direction of, or in arrangement with, a foreign power must register with the Secretary of State.
- **Scope of activities:** Activities include communications with UK ministers, MPs, political parties, election candidates, or senior civil servants, as well as public communications intended to influence UK policy or public opinion.
- **Exemptions:** Exemptions apply to diplomatic missions, legal advisers acting in legal proceedings, and certain journalistic activities. However, these are narrowly defined and subject to conditions.
- **Record-keeping and updates:** Registrants must maintain accurate records of their activities and update the register within 10 working days of any material change.

Enforcement and penalties

- **Criminal offences**
  Failure to register, providing false information, or undertaking registrable activities without registration may result in criminal prosecution. Penalties include up to two years' imprisonment and/or an unlimited fine.
- **Investigatory powers**
  The Secretary of State and law enforcement agencies are granted powers to investigate suspected breaches, including the ability to issue information notices and apply for production orders.

Impact

- **Transparency**: Enhances public awareness of foreign influence in UK political life.
- **Compliance risk**: UK-based organisations working with overseas clients must assess whether their activities fall within scope.
- **Due diligence**: Legal, lobbying, PR, and consultancy firms should review client relationships and internal procedures to ensure compliance.

- **National security**: Supports the UK's broader strategy to counter covert foreign interference and safeguard democratic institutions.

ENVIRONMENTAL

Environmental Permitting Reform Announcement – Exemptions for Low-Risk Construction Activities	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: England

Effective Date: 27 October 2025

Legislation Type: Environmental / Planning / Infrastructure Delivery

Summary

On 27 October 2025, the UK Government announced a package of reforms to the environmental permitting system in England, aimed at accelerating housing and infrastructure delivery. The reforms introduce a more proportionate, risk-based approach to permitting, with a focus on exempting certain low-risk construction activities from the requirement to obtain an environmental permit.

The changes are part of the Government's broader Regulation Action Plan and respond to industry feedback calling for reduced administrative delays and clearer guidance for developers. The Environment Agency (EA) will now have greater discretion to determine which activities can be exempted from permitting, provided appropriate environmental safeguards are in place.

Key changes

- **Permit exemptions for low-risk activities:** Activities such as site investigations, temporary drainage works, and the storage of inert waste materials may now be exempt from permitting requirements. These activities are often essential in the early stages of construction but previously required permits despite posing minimal environmental risk.
- **Faster project mobilisation:** Developers may save up to 16 weeks in project timelines by avoiding delays associated with permit applications for low-risk preparatory works. This is expected to benefit housing, solar, and onshore wind projects in particular.
- **Proportionate regulation:** The EA will apply a more flexible, common-sense approach to permitting, focusing regulatory effort on higher-risk activities while streamlining or exempting those with negligible impact.
- **Examples of exempted activities**
    - Channelling and discharge of uncontaminated rainwater
    - Temporary storage of inert construction materials

- Installation of temporary floodwater barriers
- Crane platform preparation and access routes

Impact

- **For developers and contractors**:
  - Reduced permitting burden for early-stage construction activities
  - Greater clarity on when permits are required
  - Improved project planning and cost certainty
- **For regulators**:
  - Increased flexibility to tailor permitting to risk
  - Opportunity to focus resources on higher-impact activities
- **For the environment**:
  - Environmental protections remain in place through conditions attached to exemptions
  - Focused oversight on activities with greater potential for harm

Next steps

- The Environment Agency will publish updated guidance on exempt activities and conditions in Q4 2025.
- Developers should review their project pipelines to identify where exemptions may now apply.
- Legal and environmental teams should update internal permitting checklists and workflows accordingly.

Noise Emission Outdoors (Amendment) Regs 2025	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: England, Wales and Scotland

Effective Date: 13 April 2026

Legislation Type: Environmental / Noise Control / Product Compliance

Amends: The Noise Emission in the Environment by Equipment for Use Outdoors Regulations 2001

Summary

The Noise Emission in the Environment by Equipment for Use Outdoors (Amendment and Transitional) Regulations 2025 (SI 2025/1073) were made on 9 October 2025 and laid before Parliament on 13 October 2025. They will come into force on 13 April 2026.

These Regulations update the UK's framework for controlling noise emissions from outdoor equipment—such as construction machinery, compressors, lawnmowers, and generators—by aligning with the latest EU standards and improving enforcement mechanisms. They are made under the Product Regulation and Metrology Act 2025 and reflect the UK's post-Brexit approach to product regulation.

Key changes

- **Updated definitions and references:** The definition of "Directive" is updated to reflect the latest EU amendments (Directive (EU) 2024/2839), ensuring consistency with current international standards.
- **Revised noise measurement and declaration:** Manufacturers must now use updated ISO methods (e.g. ISO 3744/3746) for determining sound power levels. Declared values must reflect the guaranteed sound power level (LWA), including measurement uncertainty.
- **Expanded scope of equipment:** The list of regulated equipment types is updated to reflect technological developments and market trends.
- **Labelling and documentation:** Equipment must display the standard noise-emission pictogram and the LWA value on the rating plate or, where impractical, on packaging and in the instruction manual. User instructions must include guidance on correct operation to maintain declared noise levels.
- **Market surveillance and enforcement:** The Regulations strengthen the powers of market surveillance authorities, enabling more effective enforcement and compliance checks. Transitional provisions are included to allow manufacturers time to adapt.

Phased implementation timeline

- **1 October 2025**: Market surveillance authorities begin proactive inspections and enforcement.
- **1 January 2026**: Mandatory use of updated ISO noise testing methods for all new declarations.
- **1 April 2026**: Deadline for transition of existing stock to updated labelling and documentation.
- **1 July 2026**: Full compliance required. Non-compliant equipment may not be sold or distributed.

Impact

- **For manufacturers and importers**:
  - Review and update technical documentation, labelling, and declarations of conformity.
  - Ensure testing procedures align with revised ISO standards.
  - Prepare for enforcement from April 2026.
- **For regulators**:
  - Enhanced ability to monitor and enforce compliance.
  - Greater clarity on permissible noise levels and labelling requirements.
- **For the environment and public health**:

- Improved control of environmental noise from outdoor equipment.
- Supports the UK's broader goals on noise pollution and sustainable product design.

Noise Emission Outdoors (Amendment) (NI) Regs 2025	Changes in the legal register ☐ yes ☒ no

Jurisdiction: Northern Ireland

Effective Date: 1 July 2025 (phased implementation through 2026)

Amends:

- The Noise Emission in the Environment by Equipment for Use Outdoors Regulations (Northern Ireland) 2002
- Regulation (EU) 2019/1020 on market surveillance (as retained)

Legislation Type: Environmental / Noise Control

Summary

These Regulations update Northern Ireland's framework for controlling noise emissions from outdoor equipment such as construction machinery, compressors, generators, and gardening tools. The amendments align with the latest EU standards under Directive 2000/14/EC and introduce modernised noise testing methods, updated labelling requirements, and enhanced enforcement powers.

The reforms aim to reduce environmental noise pollution, improve product compliance, and ensure consistency with UK and EU market surveillance practices.

Key obligations

For manufacturers and importers

- **Updated noise testing**:
  - New ISO 3744/3746-based methods must be used to determine sound power levels.
  - Measurement uncertainty must be factored into declared values.
  - Action: Update technical files and conformity assessments accordingly.
- **Revised labelling**:
  - Equipment must display the standard noise pictogram and guaranteed sound power level (LWA).
  - Where direct labelling is impractical, information must appear on packaging and in user instructions.
  - Action: Review and update product labels and documentation.
- **Declaration of conformity**:

- Must reflect updated test methods and permissible limits.
- Action: Ensure declarations are revised and retained for inspection.

For market surveillance authorities

- **Expanded enforcement powers**:
  - Includes inspection, testing, seizure, and removal of non-compliant equipment.
  - Enhanced coordination with UK and EU databases for cross-border enforcement.
  - Action: Update inspection protocols and staff training.

Phased implementation timeline

- **1 July 2025:** Regulations come into force. Applies to new equipment placed on the market.
- **1 October 2025:** Market surveillance authorities begin proactive inspections and enforcement.
- **1 January 2026:** Mandatory use of updated ISO noise testing methods for all new declarations.
- **1 April 2026:** Deadline for transition of existing stock to updated labelling and documentation.
- **1 July 2026:** Full compliance required. Non-compliant equipment may not be sold or distributed.

Impact

- **Environmental protection**: Reduces exposure to harmful noise levels in public and residential areas.
- **Market compliance**: Ensures a level playing field for compliant manufacturers and importers.
- **Regulatory alignment**: Maintains consistency with EU standards, supporting cross-border trade and enforcement cooperation.
- **Operational planning**: Businesses must act now to update testing, labelling, and documentation processes ahead of the 2026 deadlines.

Environmental Authorisations (Scotland) Amendment Regs 2025	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: Scotland

Effective Date: Phased from 1 June 2025 to 1 November 2025

Amends:

- Environmental Authorisations (Scotland) Regulations 2018
- Pollution Prevention and Control (Scotland) Regulations 2012

Legislation Type: Environmental / Permitting / Integrated Regulation

Summary

These Regulations significantly expand the scope of Scotland's integrated environmental authorisation framework. They amend the 2018 Regulations to bring water, waste, industrial emissions, and non-radioactive pollution activities under the same unified system already used for radioactive substances. The reforms aim to simplify permitting, improve regulatory consistency, and enhance SEPA's ability to manage environmental risks proportionately.

The changes support the Scottish Government's commitment to a streamlined, risk-based regulatory model that reduces administrative burden while maintaining environmental protections.

Key obligations

For operators of regulated activities

- **New authorisation tiers**
  A four-tier structure now applies across all regimes:
    - General Binding Rules (GBRs)
    - Notification
    - Registration
    - Permit

  Operators must assess whether their current authorisations need to transition to a new tier by 31 December 2025.

- **Variation and surrender**
    - Minor and standard variations now follow simplified procedures.
    - Partial surrender of permits is permitted where only part of a site is decommissioned.
        - **Action**: Update internal workflows to reflect streamlined application routes.
- **Monitoring and reporting**
    - SEPA may now request integrated compliance returns instead of multiple standalone reports.
        - **Action**: Ensure data systems are capable of consolidated reporting by January 2026.

For SEPA and the Scottish Government

- **Expanded regulatory scope**

- Carbon capture, non-waste anaerobic digestion, and certain generators are now within scope.
- Sewage sludge and waste-to-land activities are also regulated under the new framework.

- **Public participation and transparency**
  - Enhanced rights for third-party representations.
  - SEPA's register is now presumed accurate unless proven otherwise.
  - Causing false entries on the register is a new offence.
- **Enforcement flexibility**
  - SEPA may revoke permits where the operator has died or the company has been dissolved.
  - New powers to consolidate permits and impose authorisations where necessary.

Phased implementation timeline

- **1 June 2025:** Core enabling provisions come into force (Regs 1, 2, 8, 11–18, 20–21, 23–32, 34, 36).
- **1 June 2025:** Partial commencement of definitions and technical schedules for waste and radioactive substances.
- **1 July 2025:** Operators begin transition to new tiered authorisation structure.
- **1 November 2025:** Full commencement of remaining provisions, including permit consolidation, enforcement, and appeals.
- **31 December 2025:** Deadline for operators to review and transition existing licences to the new framework.
- **January 2026:** SEPA may begin requesting integrated compliance returns.

Impact

- **For operators**:
  - Greater clarity and consistency across environmental regimes
  - Reduced administrative burden through simplified variation and surrender processes
  - Need to review and potentially reclassify existing authorisations
- **For regulators**:
  - Enhanced enforcement tools and flexibility
  - Improved ability to manage environmental risks across sectors

- **For the public and environment**:
    - Stronger transparency and participation rights
    - More integrated and responsive environmental protection

Call-in Guidance under the Environmental Authorisations (Scotland) Regulations 2018	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: Scotland

Effective Date: October 2025

Amends: Environmental Authorisations (Scotland) Regulations 2018

Legislation Type: Environmental / Permitting / Regulatory Oversight

Summary

In October 2025, the Scottish Government issued updated guidance on the use of "call-in" powers under the Environmental Authorisations (Scotland) Regulations 2018. These powers allow Scottish Ministers to intervene in decisions made by the Scottish Environment Protection Agency (SEPA) regarding environmental authorisations, including permits, registrations, and notifications.

The guidance clarifies the circumstances under which Ministers may exercise their discretion to call in a case, the procedural steps involved, and the rights of operators and third parties during the process. It also outlines the relationship between SEPA's regulatory independence and Ministerial oversight.

Key provisions

- **Scope of call-in powers:** Ministers may call in any application, variation, suspension, revocation, or enforcement decision made or proposed by SEPA under the 2018 Regulations. This includes decisions relating to:
    - Environmental permits
    - Registrations and notifications
    - General Binding Rules (GBRs)
    - Enforcement notices and cost recovery
- **Grounds for call-in:** Call-in may be triggered where:
    - The case raises issues of national significance or public interest
    - There is a potential conflict with other government policy

- The decision may have significant environmental, economic, or reputational implications
- There are concerns about consistency or procedural fairness

- **Process and timelines:** SEPA must notify Ministers of certain applications or decisions that may be eligible for call-in.
    - Ministers have 28 days to decide whether to call in a case.
    - If called in, the decision-making responsibility transfers from SEPA to the Scottish Ministers.
    - The operator and relevant stakeholders must be notified and given an opportunity to make representations.
- **Transparency and publication:** All call-in decisions must be published, including the rationale for intervention.
    - The guidance encourages early engagement between SEPA and Ministers to avoid unnecessary delays.

Impact

- **For operators**:
    - Increased clarity on when Ministerial intervention may occur
    - Potential for extended timelines in high-profile or sensitive cases
    - Importance of early engagement with SEPA and awareness of policy sensitivities
- **For regulators**:
    - Reinforces SEPA's role as the primary decision-maker, while recognising Ministerial oversight in exceptional cases
    - Encourages consistent application of regulatory discretion
- **For the public and stakeholders**:
    - Enhances transparency and accountability in environmental decision-making
    - Provides a formal route for escalating concerns about SEPA decisions

Regulation (EU) 2025/1988 as regards per- and polyfluoroalkyl substances in firefighting foams	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: European Union

Effective Date: 22 October 2025

Amends: Regulation (EC) No 1907/2006 (REACH)

Legislation Type: Chemicals / Environmental Protection / Product Compliance

Summary

Regulation (EU) 2025/1988 introduces a new restriction under Annex XVII of the REACH Regulation, targeting the use of per- and polyfluoroalkyl substances (PFAS) in firefighting foams. PFAS are a large group of synthetic chemicals known for their persistence in the environment and potential risks to human health and ecosystems.

This amendment is part of the EU's Chemicals Strategy for Sustainability and reflects growing regulatory pressure to phase out PFAS in non-essential applications. The restriction applies to both the placing on the market and use of PFAS-containing firefighting foams above a defined concentration threshold.

Key obligations

For manufacturers, importers, distributors, and users of firefighting foams

- **Restriction scope**
  - From 23 October 2030, firefighting foams containing PFAS in concentrations ≥1 mg/L (sum of all PFAS) must not be placed on the market or used, unless an exemption applies.
  - The restriction applies to both new and existing foam formulations used for fire prevention, suppression, and training.
- **Definition of PFAS**
  - Any substance containing at least one fully fluorinated methyl ($–CF_3$) or methylene ($–CF_2–$) carbon atom (without any H, Cl, Br, or I atoms attached) is considered a PFAS under this regulation.
- **Exemptions**
  - Certain uses and equipment types may be exempted under specific conditions, as detailed in the amended Annex XVII.
  - Exemptions may include critical infrastructure, aviation, and defence applications, subject to review and justification.
- **Transition period**
  - The regulation allows a five-year transition period (2025–2030) to enable the development and deployment of PFAS-free alternatives.
  - During this period, users must begin phasing out PFAS-based foams and updating procurement and operational procedures.

Impact

- **Environmental protection**: Supports the EU's goal to eliminate persistent pollutants and reduce contamination of soil and water.
- **Compliance planning**: Affects manufacturers, importers, and users of firefighting foams across industrial, municipal, and aviation sectors.
- **Product reformulation**: Companies must invest in R&D to develop or adopt PFAS-free alternatives before the 2030 deadline.
- **Operational change**: Fire services and industrial users must revise foam inventories, training protocols, and emergency response plans.

Next steps

- Review current firefighting foam inventories and identify products exceeding the 1 mg/L PFAS threshold.
- Engage with suppliers to confirm compliance timelines and availability of PFAS-free alternatives.
- Update internal procurement policies and training materials to reflect the upcoming restriction.
- Monitor for further EU guidance on exemptions and implementation support.

European Union (Planning and Development) (Renewable Energy) (No. 3) Regulations 2025	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: Republic of Ireland

Effective Date: 24 September 2025

Amends: European Union (Planning and Development) (Renewable Energy) Regulations 2025

Legislation Type: Planning / Renewable Energy / Environmental Assessment

Summary

These Regulations extend transitional provisions introduced earlier in 2025 to support the implementation of the Planning and Development Act 2024, which replaced the Planning and Development Act 2000. The amendments are part of a broader legislative effort to streamline planning procedures for renewable energy projects and ensure alignment with EU permitting timelines under the Renewable Energy Directive (EU) 2018/2001.

The Regulations do not introduce new duties for organisations but provide additional time for developers and planning authorities to adapt to the updated framework.

Background

The Planning and Development Regulations supplement the primary legislation by setting out procedural and technical requirements for planning applications. These include:

- Site notice and advertisement requirements
- Application fees and time limits
- Environmental Impact Assessment (EIA) content and exemption criteria
- Conditions for exempted developments (see Schedule 2)

Local authorities act as planning authorities for most developments, while An Coimisiún Pleanála handles appeals and strategic infrastructure applications.

Key amendment

- **Extension of transitional period:** The transitional arrangements introduced by the original 2025 Regulations are extended to 1 May 2026. This extension allows planning authorities and applicants to continue operating under the previous procedural rules while adapting to the new framework introduced by the Planning and Development Act 2024.
- **No change to duties:** There are no new or revised duties for organisations. Existing obligations under the 2025 Regulations remain in force.

Impact

- **For developers**:
  - Additional time to prepare for compliance with the new planning regime
  - Continued use of familiar procedures for site notices, EIA submissions, and application formats until May 2026
- **For planning authorities**:
  - Extended window to update internal systems and guidance in line with the 2024 Act
  - Reduced risk of administrative disruption during the legislative transition
- **For renewable energy projects**:
  - Supports continuity in permitting for solar, wind, and other renewable infrastructure
  - Reinforces Ireland’s commitment to streamlined planning for clean energy deployment

Directive 2008/98/EC on waste – Waste Framework Directive	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: European Union

Effective Date: 30 September 2025

Amends: Directive 2008/98/EC on waste

Legislation Type: Environmental / Waste / Circular Economy

Summary

Directive (EU) 2025/1892 introduces targeted amendments to the EU Waste Framework Directive (Directive 2008/98/EC), reinforcing the EU's commitment to a circular economy and improved resource efficiency. The Directive continues to require Member States to take measures to protect human health and the environment by preventing or reducing the generation and harmful impacts of waste.

The latest amendment focuses on food waste prevention and the introduction of extended producer responsibility (EPR) for textiles. It also clarifies the scope of gaseous effluent exclusions in relation to carbon capture and storage.

Key provisions

For EU Member States
Member States must continue to implement and enforce the core requirements of the Waste Framework Directive, including:

- Applying the waste hierarchy in national legislation and policy
- Defining when materials are considered by-products or have achieved end-of-waste status
- Ensuring permitting for waste treatment, collection, and transport
- Maintaining records for hazardous waste and ensuring proper labelling, packaging, and segregation
- Developing and updating national waste management plans and waste prevention programmes
- Operating extended producer responsibility (EPR) schemes for relevant waste streams

Amendments introduced by Directive (EU) 2025/1892

- **Food waste prevention**:
  Member States must adopt legislation by 17 June 2027 to introduce binding measures aimed at preventing food waste generation across the supply chain.
- **Textile EPR**:
  Member States must establish extended producer responsibility schemes for textiles by the same deadline (17 June 2027), ensuring that producers contribute to the cost of collection, sorting, reuse, and recycling of textile waste.
- **Clarification on gaseous effluents**:
  The Directive now explicitly excludes gaseous effluents that are emitted and stored in accordance with Directive 2009/31/EC on the geological storage of carbon dioxide. This ensures legal clarity for carbon capture and storage (CCS) operations.

Impact

- **For organisations**:
  - No direct compliance duties under this Directive. Obligations fall on Member States to transpose and implement the requirements.
  - However, organisations involved in food production, retail, or textiles should monitor national legislation for upcoming changes to EPR schemes and waste prevention obligations.
- **For Member States**:
  - Legislative updates required by 17 June 2027 to address food waste and textile EPR
  - Continued obligation to maintain comprehensive waste management frameworks in line with EU circular economy goals
- **For the environment**:
  - Supports waste reduction, improved recycling, and more sustainable use of resources
  - Reinforces the EU's broader climate and sustainability objectives

HEALTH & SAFETY

"Awaab's Law" – Damp & Mould Hazard Regulations 2025	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: England

Effective Date: 27 October 2025

Legislation Type: Housing / Health & Safety / Social Landlord Regulation

Amends: Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025

Summary

"Awaab's Law" introduces legally binding timeframes for social landlords to investigate and resolve significant damp and mould hazards in social housing. The law is named in memory of Awaab Ishak, a two-year-old who tragically died in 2020 due to prolonged exposure to mould in his home.

The Regulations form part of the Government's wider housing safety reforms under the Social Housing (Regulation) Act 2023. They apply to all registered providers of social housing in England and are enforced through implied contractual obligations in tenancy agreements.

Key obligations

From 27 October 2025, social landlords must:

- Make safe any emergency hazard within 24 hours of being notified.
- Investigate significant damp and mould hazards within 10 working days.
- Provide a written summary of findings within 3 working days of inspection, including:
    - The nature of the hazard
    - Planned remedial actions
    - Timelines for resolution
- Complete urgent remedial works (e.g. mould wash) within 5 working days of inspection.
- Begin structural or preventative works within 12 weeks of the initial report.
- Provide temporary accommodation if the property cannot be made safe within the required timeframe.

Phased implementation

- **27 Oct 2025:** Damp and mould hazards and emergency hazards (Phase 1)
- **2026:** Expansion to include: excess cold/heat, falls, structural collapse, fire, electrical, hygiene and food safety hazards (Phase 2)
- **2027:** All remaining HHSRS hazards (excluding overcrowding) (Phase 3)

Impact

- **For social landlords**:
    - Must implement robust inspection, reporting, and repair systems
    - Required to maintain accurate records and provide written updates to tenants
    - May face legal action for breach of tenancy if timeframes are not met
- **For tenants**:
    - Stronger legal protections and clearer expectations
    - Right to escalate unresolved hazards through legal channels
- **For the housing sector**:
    - Reinforces the Regulator of Social Housing's Safety and Quality Standard
    - Encourages proactive maintenance and tenant engagement

QUALITY	
Employment Rights (Increase of Limits) Order 2025	**Changes in the legal register**

	☐ yes ☒ no

Jurisdiction: United Kingdom

Effective Date: 6 April 2025

Legislation Type: Employment / Compensation / Tribunal Awards

Summary

This annual Order increases the statutory compensation limits and other financial thresholds applicable to employment rights claims in line with the Retail Prices Index (RPI). The revised limits apply to relevant events occurring on or after 6 April 2025, such as dismissals, redundancies, and breaches of employment contracts.

The Order is made under section 34 of the Employment Relations Act 1999 and amends various provisions of the Employment Rights Act 1996 and related legislation.

Key changes

The following are among the most notable increases introduced by the Order:

Provision	**Previous Limit (2024)**	**New Limit (2025)**
Maximum compensatory award for unfair dismissal	£105,707	£109,420
Limit on a week's pay (used for redundancy and basic award calculations)	£700	£725
Minimum basic award for certain unfair dismissals (e.g. health & safety)	£7,836	£8,070
Guarantee pay (daily rate)	£35	£38

Note: These figures are illustrative. Refer to the official Schedule for the full list of updated limits.

Application

- The new limits apply to cases where the "relevant event" (e.g. the effective date of termination) occurs on or after 6 April 2025.
- For events before that date, the previous limits continue to apply.

Impact

- **For employers**:

- HR and payroll teams should update internal policies and settlement templates to reflect the new limits.
- Legal and finance teams should factor in the increased exposure when assessing litigation risk and budgeting for potential tribunal claims.

- **For employees**:
  - Individuals pursuing claims for unfair dismissal or redundancy may be entitled to higher compensation from April 2025 onwards.
- **For advisers and tribunals**:
  - Legal representatives and employment tribunals must apply the correct limits based on the date of the relevant event, not the date of the hearing or judgment.

Pneumoconiosis etc. (Workers' Compensation) (Payment of Claims) (Amendment) Regulations 2025	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: United Kingdom

Effective Date: 1 April 2025

Legislation Type: Social Security / Occupational Health / Compensation

Amends: Pneumoconiosis etc. (Workers' Compensation) (Payment of Claims) Regulations 1988

Summary

These Regulations amend the 1988 Payment of Claims Regulations made under the Pneumoconiosis etc. (Workers' Compensation) Act 1979. The scheme provides lump-sum compensation to individuals (or their dependants) who have developed certain dust-related diseases due to workplace exposure and who are unable to claim compensation from a former employer—typically due to insolvency or lack of insurance.

The 2025 amendment updates the payment amounts to reflect inflation and ensures continued alignment with the Industrial Injuries Disablement Benefit (IIDB) framework.

Key provisions

- **Updated compensation amounts**
  Lump-sum payments for eligible claimants have been increased in line with inflation. The revised amounts vary depending on the age of the claimant and the assessed level of disablement.
  Action: Claimants and advisers should refer to the updated Schedule for the full payment table.
- **Eligibility criteria unchanged**
  The amendment does not alter the qualifying conditions under the 1979 Act. Claimants must still demonstrate:
  - Diagnosis of a specified disease (e.g. pneumoconiosis, byssinosis, diffuse mesothelioma, asbestosis)

- Inability to pursue a civil claim due to the employer no longer existing
- No prior compensation received for the same condition

- **Dependants' claims**
  Where the affected worker has died, eligible dependants may apply for compensation. The 2025 amendment also increases the amounts payable to dependants.

Impact

- **For claimants and dependants**
  - Ensures compensation remains fair and reflective of current economic conditions
  - Provides financial support to individuals affected by historic occupational exposure to harmful dusts
- **For advisers and support organisations**
  - Important to use the updated payment tables for claims submitted on or after 1 April 2025
  - No change to application procedures or evidentiary requirements
- **For government and regulators**
  - Maintains the integrity and responsiveness of the compensation scheme
  - Reinforces the UK's commitment to supporting workers affected by legacy industrial diseases

Why this matters in October 2025

October marks six months since the revised compensation rates came into force. This is a key point for:

- **Reviewing claims**: Employers, advisers and support organisations should ensure that any claims submitted since April 2025 reflect the updated payment tables.
- **Supporting dependants**: Families of deceased workers may be eligible for increased compensation under the revised scheme.
- **Raising awareness**: October is often a focal month for occupational health campaigns, making it an opportune time to promote awareness of historic exposure risks and available compensation routes.

This update also coincides with renewed parliamentary attention on legacy industrial diseases, including asbestos-related illness and silicosis, reinforcing the importance of proactive support and accurate claims processing.

Economic Crime and Corporate Transparency Act 2023	**Changes in the legal register** ☐ yes ☒ no

Jurisdiction: United Kingdom

Effective Date: Phased from 4 March 2024 to 18 November 2025

Legislation Type: Corporate Governance / Anti-Fraud / Companies House Reform

Summary

The Economic Crime and Corporate Transparency Act 2023 (ECCTA) introduces wide-ranging reforms to UK company law, corporate transparency, and anti-fraud enforcement. It strengthens the role of Companies House, introduces new identity verification requirements for company directors and beneficial owners, and creates a new corporate offence of "failure to prevent fraud."

The Act is being implemented in stages, with key provisions entering into force throughout 2024 and 2025. It builds on the earlier Economic Crime (Transparency and Enforcement) Act 2022 and is part of the UK Government's broader strategy to combat economic crime and improve trust in the corporate register.

Key provisions

1. Companies House reforms

- Companies House now has enhanced powers to query, reject, or remove information that is false, misleading, or incomplete.
- The Registrar must promote the integrity of the register and prevent its misuse.
- Companies must provide a registered email address and confirm lawful purpose on incorporation and annually thereafter.

2. Identity verification

- From 18 November 2025, all company directors, persons with significant control (PSCs), and those filing documents on behalf of companies must verify their identity.
- Verification can be completed directly with Companies House or via Authorised Corporate Service Providers (ACSPs).
- Unique identifiers will be issued to verified individuals.

3. Failure to prevent fraud offence (FTPF)

- A new corporate offence applies to large organisations that fail to prevent fraud by associated persons.
- "Large" is defined as meeting two of the following:
  - Turnover > £36 million
  - Balance sheet total > £18 million
  - 250 employees
- The offence came into force on 1 September 2025.

4. Limited partnerships and overseas entities

- New transparency and registration requirements apply to limited partnerships and overseas entities operating in the UK.
- These include obligations to maintain accurate information and notify changes promptly.

Implementation timeline

- **4 March 2024:** Initial Companies House powers commenced (querying, rejecting filings)
- **1 September 2025:** Failure to prevent fraud offence (Schedule 13) in force
- **18 November 2025:** Identity verification requirements for directors and PSCs commence
- **2026–2027:** Further secondary legislation expected to support enforcement and compliance mechanisms

Impact

- **For companies and directors**:
  - Must prepare for mandatory identity verification and ensure compliance with new filing requirements
  - Should review internal fraud prevention procedures to mitigate risk under the FTPF offence
- **For ACSPs and advisers**:
  - Must register with Companies House and comply with verification and reporting obligations
  - Should support clients in understanding and implementing the new requirements
- **For regulators and enforcement bodies**:
  - Enhanced tools to detect and prevent corporate abuse, shell companies, and economic crime
  - Stronger collaboration between Companies House, law enforcement, and HMRC

Employment Rights Bill (UK-wide): October 2025	**Changes in the legal register** ☐ yes ☒ no
Jurisdiction: United Kingdom **Effective Date**: TBC (Bill currently in final parliamentary stages) **Legislation Type**: Employment / Labour Market Reform / Workers' Rights **Summary**	

The Employment Rights Bill, introduced in October 2024, is the centrepiece of the UK Government's "Make Work Pay" agenda. It represents the most significant overhaul of employment law in over a decade, aiming to modernise the legislative framework, enhance protections for workers, and improve fairness and flexibility in the labour market. As of October 2025, the Bill is in the final stages of parliamentary scrutiny, with the House of Lords scheduled to consider Commons amendments on 28 October 2025. Royal Assent is expected before the end of the year, with phased commencement dates to follow in 2026. **Key provisions** **1. Zero-hours contracts** • Right to request a predictable working pattern after 12 weeks • Compensation for cancelled shifts without reasonable notice • Definition of "reasonable notice" to be set in secondary legislation **2. Flexible working** • Day-one right to request flexible working • Employers must consult before rejecting a request • Maximum response time reduced from three months to one month **3. Unfair dismissal and redundancy** • Enhanced protections for pregnant workers and new parents • Day-one rights for protection from unfair dismissal in specific circumstances • Reforms to collective redundancy consultation thresholds **4. Trade unions and industrial action** • Strengthened protections for union members • New duties on employers to consult and negotiate in good faith • Establishment of the Fair Work Agency to oversee enforcement **5. Other reforms** • Statutory sick pay: removal of the lower earnings limit • New rights to bereavement leave and unpaid parental leave • Regulation of umbrella companies and gig economy practices • Whistleblower protections and anti-harassment duties • Mandatory Seafarers' Charter and reforms to maritime employment law	

Implementation timeline (indicative)
 	
• **10 Oct 2024:** Bill introduced in House of Commons
• **Mar–Sep 2025:** Committee, report, and third reading stages in both Houses
• **28 Oct 2025:** Lords consideration of Commons amendments ("ping pong")
• **Nov–Dec 2025:** Royal Assent expected
• **2026 onwards:** Phased commencement of key provisions via secondary legislation
 	
Impact
 	
• **For employers**:
  ○ Significant changes to contracts, HR policies, and workforce planning
  ○ Increased administrative and compliance obligations, particularly around flexible working, shift scheduling, and dismissal procedures
  ○ Need to prepare for new enforcement powers and oversight by the Fair Work Agency
• **For employees**:
  ○ Stronger protections and greater clarity around working conditions
  ○ Improved access to flexible work, leave entitlements, and job security
• **For HR and legal teams**:
  ○ Urgent need to review employment contracts, handbooks, and internal procedures
  ○ Monitor secondary legislation and guidance for detailed implementation requirements	