



LEGISLATION UPDATE

December 2025

Introduction and disclaimer

The main legal texts published between 1st and 31st of December 2025 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.

This Newsletter does not replace each organisation's duty to know the legal requirements applicable to their activity.

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.



LEGISLATION UPDATE

December 2025

QUALITY

Financial Services and Markets Act 2000 (Regulated Activities) (ESG Ratings) Order 2025

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Published date: 18 December 2025

Commencement date: 29 June 2028

Amends: Financial Services and Markets Act 2000 (Regulated Activities) Order 2001 and related financial services legislation

Summary

This Order brings ESG (Environmental, Social and Governance) ratings providers within the scope of UK financial services regulation for the first time. The instrument amends the Regulated Activities Order 2001 to specify the provision of ESG ratings as a regulated activity under the Financial Services and Markets Act 2000 (FSMA). The change reflects growing reliance on ESG ratings in investment decision-making, risk management, and regulatory reporting, and aims to improve transparency, integrity and trust in the ESG ratings market.

Key obligations

For ESG ratings providers

- **Regulatory authorisation:**
Providers offering ESG ratings to UK clients must be authorised or registered with the Financial Conduct Authority (FCA) from the commencement date. Unauthorised provision of ESG ratings will be a criminal offence.
- **Conduct and governance:**
Providers must comply with FCA rules on governance, conflicts of interest, transparency of methodologies, and disclosure of key assumptions and data sources.
- **Ongoing supervision:**
ESG ratings providers will be subject to FCA supervision, including requirements for complaints handling, record-keeping, and regular reporting.

For financial services firms and users

- **Due diligence:**
Firms using ESG ratings in investment processes, product design, or disclosures should ensure that ratings are sourced from FCA-authorised providers and that appropriate due diligence is conducted on the methodologies and limitations of the ratings used.
- **Disclosure:**
Where ESG ratings are referenced in client communications, product documentation, or regulatory filings, firms must ensure that the source and status of the provider are clearly disclosed.



LEGISLATION UPDATE

December 2025

For compliance and legal teams

- **Policy and process updates:**
Review and update internal policies, supplier onboarding procedures, and compliance checklists to reflect the new regulatory status of ESG ratings providers.
- **Training:**
Ensure relevant staff are trained on the regulatory requirements and the implications for procurement and use of ESG ratings.

Impact

- **Market integrity:**
The Order is expected to improve the quality, reliability and comparability of ESG ratings used in UK financial markets.
- **Regulatory certainty:**
Brings the UK in line with international developments, providing clarity for market participants and supporting the FCA's objectives of consumer protection and market integrity.
- **Operational change:**
ESG ratings providers and users will need to adapt systems, contracts and disclosures to ensure compliance by the commencement date.

Note:

Transitional provisions may apply for existing providers and contracts. Firms should review FCA guidance and prepare for authorisation or registration processes well in advance of the effective date.

ENVIRONMENTAL

The Ozone-Depleting Substances (Grant of Halon Derogations) Regulations 2025 (SI 2025/1276)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Effective date: 30 December 2025

Amends: Implements specific derogations under the retained EU Regulation (EC) No 1005/2009 on substances that deplete the ozone layer, extending the statutory end date for halon 1211 use in certain Defence and Loganair aircraft due to the lack of feasible alternatives.

Summary

These Regulations grant time-limited, specific derogations (exemptions) for the continued use of halon 1211—an ozone-depleting substance—in portable fire extinguishers for designated aircraft in the United Kingdom. Most uses of halons have been banned due to their environmental impact, but this regulation allows limited exemptions for critical applications in Defence and essential air services, where no technically or economically viable alternatives exist. The regulation was made and commenced in December 2025, directly responding to the statutory phase-out deadline of 31 December 2025.



LEGISLATION UPDATE

December 2025

- For Defence aircraft: derogations are granted until 30 June 2027 for certain types, and until 31 December 2040 for others.
- For Loganair aircraft: derogations are granted until 31 December 2026.

Key Obligations

For operators and asset owners

- Use of halon 1211 after the general phase-out is only permitted for the specific aircraft and time periods listed in the Regulations.
- Holders of derogations must maintain detailed records of halon stocks, usage, and disposal, and submit annual reports to the regulator as specified in the derogation conditions.
- All derogations are subject to strict conditions, including containment, leak prevention, and safe disposal. Non-compliance may result in withdrawal of the derogation and enforcement action.

For compliance and environmental teams

- Update internal policies and operational procedures to reflect the new derogations and ongoing compliance requirements for any continued halon use.
- Regularly review the availability of alternative technologies and prepare to transition away from halons as soon as feasible alternatives become available.
- Ensure relevant staff are trained on the regulatory requirements, safe handling, and reporting obligations associated with halon use under derogation.

Impact

- Supports the UK's obligations under the Montreal Protocol and domestic law to phase out ozone-depleting substances, while allowing limited, justified use in critical safety applications.
- Provides regulatory certainty for organisations that require continued halon use, with robust oversight and enforcement mechanisms.
- Organisations relying on halon systems must plan for eventual transition to alternatives and ensure full compliance with derogation conditions to avoid penalties.

Note:

These derogations are temporary and will be reviewed periodically. Organisations should monitor regulatory updates and technological developments to ensure timely compliance with future phase-out requirements. The regulation was made, laid before Parliament, and commenced in December 2025, making it directly relevant to that period.

The Levelling-up and Regeneration Act 2023 (Commencement No. 8 and Transitional Provision) Regulations 2025

Changes in the legal register

☐ yes ☒ no

Jurisdiction: England

Effective date: 2 December 2025



LEGISLATION UPDATE

December 2025

Amends: Brings further provisions of the Levelling-up and Regeneration Act 2023 into force, specifically relating to compulsory purchase procedures and associated transitional arrangements.

Summary

These Regulations are the eighth commencement order under the Levelling-up and Regeneration Act 2023. They came into force on 2 December 2025, activating additional sections of the Act. The instrument primarily implements changes to compulsory purchase order (CPO) procedures, including requirements for online publicity and conditional confirmation of CPOs. Transitional provisions are included to ensure a smooth changeover from previous regimes, particularly for local planning authorities and developers with ongoing projects.

Key Obligations

For local planning authorities

- Update procedures for compulsory purchase orders to comply with new requirements for online publicity and conditional confirmation.
- Apply transitional arrangements for CPOs initiated before the effective date, as specified in the Regulations.

For developers and landowners

- Transitional arrangements apply to CPOs and related applications submitted before 2 December 2025, ensuring ongoing projects are not disrupted by the new rules.

For compliance and legal teams

- Review and update internal procedures, contract templates, and compliance checklists to reflect the new statutory duties and transitional provisions.

Impact

- **Enhanced transparency:** Online publicity requirements improve public access to information about CPOs.
- **Legal certainty:** Transitional provisions ensure that projects already underway are not adversely affected by the change in law.
- **Process improvement:** Conditional confirmation powers provide greater flexibility in managing CPOs.

Note:

This commencement order does not introduce new duties for annual performance reporting, Model Infrastructure Levy adoption, or expanded powers for empty homes and regeneration. Those reforms are contained in other sections of the Act and will be commenced by separate instruments.

Failure to comply with the updated CPO procedures may result in delays or legal challenges. Transitional arrangements are in place for projects already underway or approved before the effective date.

The Biocidal Products (Data Protection Periods) (Amendment) Regulations 2025

Changes in the legal register

☐ yes ☒ no



LEGISLATION UPDATE

December 2025

Jurisdiction: United Kingdom

Effective date: 30 December 2025

Amends: Primarily amends Article 95(5) of the GB Biocidal Products Regulation (BPR), extending the data protection end date for certain active substances. Also makes minor technical amendments to related legislation.

Summary

These Regulations extend the maximum data protection period for studies and information submitted in support of active substance approvals under the GB BPR. The main change is to move the “hard stop” for data protection from 31 December 2025 to 31 December 2030 for active substances in the GB Review Programme. This supports the UK’s obligations under the Biocidal Products Regulation and provides greater certainty for businesses seeking authorisation for biocidal products and active substances. Minor technical amendments are also included.

Key obligations

For applicants and authorisation holders

- **Revised data protection periods:** The maximum period for data protection on studies supporting active substance approvals is extended to 31 December 2030 for qualifying substances. This applies to ongoing and future applications within the scope of the GB Review Programme.
- **Transitional arrangements:** Transitional provisions clarify the treatment of ongoing applications and existing data protection rights. Applicants should review the status of their submissions and ensure compliance with the amended requirements.

For compliance and regulatory teams

- **Documentation and record-keeping:** Maintain accurate records of data ownership and data protection periods. Ensure all new and ongoing submissions reflect the revised end date.
- **Process updates:** Review and update internal procedures for submitting applications and responding to HSE requests for information.

Impact

- **Regulatory clarity:** Provides greater certainty for businesses seeking biocidal product authorisations and supports innovation and investment in new biocidal products and active substances.
- **Reduced duplication:** Encourages the use of existing studies to reduce unnecessary animal testing and duplication of effort.
- **International alignment:** Aligns UK data protection periods with those in the EU and other major jurisdictions, supporting mutual recognition and trade.

Note:

Immediate action is required for applications and authorisations affected by the revised data protection end date. Applicants and authorisation holders should review their arrangements and consult HSE guidance for further details on compliance.



LEGISLATION UPDATE

December 2025

Producer Responsibility Obligations (Packaging and Packaging Waste) (Amendment) Regulations 2025	Changes in the legal register <input type="checkbox"/> yes <input checked="" type="checkbox"/> no
<p>Jurisdiction: United Kingdom</p> <p>Effective date: 1 January 2026</p> <p>Amends: Producer Responsibility Obligations (Packaging Waste) Regulations 2024 and related legislation.</p> <p>Summary</p> <p>These Regulations amend the UK's extended producer responsibility (EPR) regime for packaging. The changes are designed to improve recycling rates, reduce environmental impact, and ensure fairer cost allocation across the packaging supply chain. Key amendments include technical updates to definitions, new provisions for closed-loop food-grade plastic offsets, and enabling powers for Producer Responsibility Organisations (PROs). The amendments support the UK's transition to a circular economy and align with international best practice.</p> <p>December 2025 is directly relevant because:</p> <ul style="list-style-type: none">• The regulations were made and published in December 2025, marking the transition period for businesses to prepare for compliance before the new rules take effect in January 2026.• Fee guidance and transitional arrangements were announced in December 2025, providing clarity for producers and compliance schemes ahead of implementation. <p>Key Obligations</p> <p>For producers, importers, and online marketplaces</p> <ul style="list-style-type: none">• Clarified producer obligations: The amendments clarify the treatment of online marketplaces and certain importers within the definition of "producer". Producers must register annually, report detailed packaging data, and finance the collection, recycling, and recovery of packaging waste.• Modulated fees: New requirements for modulated fees based on the recyclability and environmental impact of packaging materials. Producers must provide more granular data on packaging types, materials, and end destinations.• Closed-loop offsets: New provisions for reporting and offsetting food-grade plastics recycled in closed-loop systems.• Labelling and consumer information: Requirements for clear labelling of packaging to indicate recyclability and disposal instructions are evolving, with further guidance expected. <p>For compliance schemes and waste management operators</p> <ul style="list-style-type: none">• Data reporting and transparency: Enhanced data reporting requirements for obligated producers. Compliance schemes must audit and validate producer data submissions.• Cost allocation and payments: Costs for collection, sorting, and recycling are apportioned more transparently across the supply chain. Producers are responsible for funding consumer communications and anti-littering measures. New payment schedules and penalties for late or inaccurate payments are introduced.	



LEGISLATION UPDATE

December 2025

- **Governance and enforcement:** Compliance schemes must meet stricter approval criteria and demonstrate robust governance. The Environment Agency and devolved regulators are given enhanced powers to audit, investigate, and enforce compliance.

For compliance and legal teams

- **Policy and process updates:** Review and update internal procedures, contracts, and compliance checklists to reflect the new statutory duties and reporting requirements.
- **Record-keeping:** Maintain accurate records of packaging data, payments, and communications. Ensure all new and ongoing submissions reflect the amended requirements.

Impact

- **Increased producer responsibility:** The amendments increase producer responsibility and support higher recycling rates, improving transparency and fairness in cost allocation across the packaging supply chain.
- **Operational change:** Producers, importers, and online marketplaces must adapt systems and supply chains to ensure compliance. Compliance schemes and waste management operators must update data management and reporting processes.
- **Regulatory certainty:** The changes provide a clearer, more robust legal framework for packaging EPR, supporting the UK's environmental targets and circular economy ambitions.

Note:

Non-compliance may result in financial penalties, suspension from the scheme, or prosecution. Transitional arrangements announced in December 2025 apply for existing contracts and ongoing reporting periods. Producers and compliance schemes should consult the latest guidance from the Environment Agency and devolved regulators.

Clean Heat Market Mechanism (Amendment) Regulations 2025

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Effective date: 12 December 2025 (main provisions), with new low-carbon heat targets applying from 1 April 2026

Amends: Clean Heat Market Mechanism Regulations 2025 and related legislation.

Summary

These Regulations amend the Clean Heat Market Mechanism (CHMM), the UK's flagship policy to accelerate the transition from fossil fuel heating to low-carbon alternatives such as heat pumps. The amendments refine the operation of the CHMM, clarify compliance requirements for heating appliance manufacturers, and update the allocation of clean heat targets. The changes are intended to ensure the scheme remains effective, proportionate, and aligned with the UK's net zero commitments.

December 2025 is directly relevant because:

- The amendments were made and came into force in December 2025, making the new rules and definitions legally binding from that month.



LEGISLATION UPDATE

December 2025

- December 2025 is the transition period for manufacturers, suppliers, and compliance teams to adapt to the new requirements, update certification processes, and prepare for the higher targets and new definitions that will apply from April 2026.

Key Obligations

For heating appliance manufacturers and importers

- **Revised clean heat targets:** The amendments increase the low-carbon heat installation target for scheme years beginning 1 April 2026 from 6% to 8% of relevant boiler sales. Targets may be adjusted to reflect market conditions, supply chain constraints, or policy developments.
- **Certification requirements:** The Microgeneration Certification Scheme (MCS) is now the sole certification scheme for CHMM compliance.
- **Definition updates:** The definition of a “hybrid heating system” is updated so that such a system is not required to provide hot water in addition to space heating, where hot water is not needed for the building.
- **Credit trading and compliance:** Manufacturers can continue to trade clean heat credits to meet their obligations. The amendments clarify the rules for credit generation, transfer, and surrender, and introduce new reporting requirements for credit transactions.
- **Reporting and record-keeping:** Enhanced requirements for the submission of sales data, evidence of compliance, and retention of records. Manufacturers must submit annual compliance statements and may be subject to audit by the regulator.

For compliance and legal teams

- **Policy and process updates:** Review and update internal compliance procedures, supplier contracts, and product tracking systems to ensure alignment with the amended CHMM requirements.
- **Staff training:** Ensure relevant staff are aware of the updated targets, certification, credit trading rules, and reporting obligations.

For distributors and installers

- **Product sourcing:** Distributors and installers should ensure that products sourced from manufacturers are compliant with the latest CHMM requirements and that supply chain documentation is up to date.

Impact

- **Market certainty:** The amendments provide greater clarity and flexibility for manufacturers, supporting investment in clean heat technologies and supply chains.
- **Environmental benefit:** The CHMM continues to drive the uptake of low-carbon heating, supporting the UK’s carbon budgets and net zero targets.
- **Operational change:** Manufacturers and importers must adapt systems and processes to ensure ongoing compliance, particularly in relation to certification, credit trading, and reporting.

Note:

Non-compliance with the CHMM may result in financial penalties, enforcement action, or exclusion from the market. Transitional arrangements may apply for products placed on the market before the effective



LEGISLATION UPDATE

December 2025

date of the amendments. Manufacturers should consult the latest guidance from the Department for Energy Security and Net Zero.

INFORMATION SECURITY

The Data (Use and Access) Act 2025 (Commencement No. 4) Regulations 2025 (SI 2025/1213)

Changes in the legal register

☐ yes ☒ no

Jurisdiction: United Kingdom

Effective date: 1 December 2025

Amends: Brings further provisions of the Data (Use and Access) Act 2025 into force, specifically relating to digital verification services.

Summary

These Regulations are the fourth commencement order under the Data (Use and Access) Act 2025. They bring into force most of Part 2 of the Act, establishing the statutory framework for digital verification services (DVS) in the UK. The new provisions set out requirements for the lawful use, sharing, and access to personal and non-personal data in the context of digital verification. The Act aims to strengthen data governance, support responsible innovation, and ensure robust safeguards for individuals and organisations. Other sections of the Act, including broader data sharing and access provisions, are commenced by separate instruments.

Key obligations

For public bodies, private organisations, and data intermediaries

- **Digital verification services:** Organisations providing or relying on digital verification services must comply with new statutory requirements, including transparency, accountability, and data minimisation.
- **Lawful use and access:** Enhanced requirements for the lawful processing and sharing of data in the context of digital verification.
- **Transitional arrangements:** Entities must ensure that all digital verification activities comply with the newly commenced provisions from 1 December 2025. Guidance is provided for organisations updating policies and systems.

For compliance, IT, and legal teams

- **Policy and process updates:** Review and update internal data governance, access, and sharing procedures to ensure compliance with the new requirements. Maintain accurate records of data processing, access requests, and safeguards.
- **Training and awareness:** Ensure relevant staff are aware of the new obligations and the implications for operations, reporting, and supply chain management.

For the Information Commissioner's Office (ICO)



LEGISLATION UPDATE

December 2025

- **Regulatory oversight:** The ICO is granted new powers to monitor compliance and investigate breaches relating specifically to digital verification services under these Regulations. Non-compliance may result in enforcement notices, financial penalties, or other regulatory action. The appeals process for enforcement actions is clarified.

Impact

- **Strengthened data protection:** The Regulations reinforce the UK's framework for digital verification, supporting responsible innovation while ensuring robust safeguards for individuals and data subjects.
- **Operational change:** Organisations must adapt data governance, access, and sharing procedures to comply with the new legal requirements for digital verification.
- **Compliance risk:** Failure to comply may result in regulatory action, financial penalties, or reputational harm.

Note:

The Regulations apply to digital verification services from 1 December 2025 onwards. Broader provisions of the Data (Use and Access) Act 2025 are commenced by separate instruments. Organisations should consult the latest ICO guidance and ensure all policies, systems, and staff training are up to date.

The Radio Equipment (Amendment) (Northern Ireland) Regulations 2025

Changes in the legal register

☐ yes ☒ no

Jurisdiction: Northern Ireland

Effective date: 16 December 2025

Amends: The Radio Equipment Regulations 2017 (as they apply in Northern Ireland)

Summary

These Regulations amend the Radio Equipment Regulations 2017 as they apply in Northern Ireland, updating technical requirements and conformity assessment procedures for radio equipment placed on the market. The amendments ensure ongoing alignment with relevant EU law under the Northern Ireland Protocol, address emerging technologies, and clarify obligations for manufacturers, importers, and distributors.

Key obligations

For manufacturers, importers, and distributors

- **Updated technical requirements:**
Radio equipment placed on the Northern Ireland market must comply with revised essential requirements, including those relating to electromagnetic compatibility, efficient use of the radio spectrum, and user safety.
- **Conformity assessment and documentation:**
Manufacturers must ensure that equipment undergoes the appropriate conformity assessment procedure and is accompanied by updated technical documentation and a Declaration of Conformity.



LEGISLATION UPDATE

December 2025

- **Marking and labelling:**
Products must bear the CE marking and, where applicable, the UK(NI) indication. Labelling must be clear, legible, and durable.
- **Market surveillance and cooperation:**
Economic operators must cooperate with enforcement authorities, provide technical documentation on request, and take corrective action if non-compliance is identified.

For compliance and regulatory teams

- **Policy and process updates:**
Review and update internal compliance procedures, supplier contracts, and product documentation to reflect the amended requirements.
- **Training:**
Ensure relevant staff are aware of the updated obligations, especially regarding conformity assessment, labelling, and record-keeping.

Impact

- **Regulatory certainty:**
The amendments provide clarity for businesses placing radio equipment on the Northern Ireland market, supporting continued access and compliance under the dual UK/EU regulatory regime.
- **Operational change:**
Manufacturers, importers, and distributors must adapt processes and documentation to ensure ongoing compliance with the revised requirements.
- **Market access:**
Continued compliance with both UK and EU requirements is essential for market access in Northern Ireland and the wider EU.

Note:

Non-compliance may result in enforcement action, including product recalls, fines, or restrictions on placing equipment on the market. Businesses should monitor for further updates and sector-specific guidance.