Galicia

Labor Update

Publication of the Updated NOM-005-STPS-2025 on Hazardous Chemical Substances and Mixtures

Mexico City, November 25, 2026

Yesterday, November 24, 2026, the Ministry of Labor and Social Welfare (the "STPS") published the Official Mexican Standard NOM-005-STPS-2025, Handling of hazardous chemical substances or mixtures thereof in the workplace – Health and safety conditions and procedures (the "NOM"), in the Federal Official Gazette (the "DOF").

The NOM updates NOM-005-STPS-1998, Safety and hygiene conditions in the workplace for the handling, transportation and storage of hazardous chemical substances, published in the DOF on February 2, 1999.

Its purpose is to prevent risks to employees and damage to the workplace arising from the handling of hazardous chemical substances or mixtures thereof. It applies nationwide to workplaces where such substances are used, transported, transferred between containers, stored or processed.

Key Employer Obligations

Employers must maintain an up-to-date inventory of hazardous chemical substances or mixtures thereof and make the corresponding safety data sheets available for employees to consult. Employers must also provide appropriate signage for containers, storage areas and work areas and identify the hazards associated with fluids conveyed through piping systems.

Employers must also prepare and maintain a risk assessment that considers the physical, chemical and toxicological properties of the substances; maximum quantities based on installed capacity; exposed areas and personnel; processes, equipment and facilities; and accident history. The risk assessment must be updated whenever quantities, substances or processes change, whenever unforeseen events occur and, in any event, every five years.

Workplaces must have valid, up-to-date and identifiable written safety procedures in Spanish. These procedures must govern, as applicable, the use, storage, processing, transfer between

containers and transportation of substances, as well as cleaning and decontamination, lockout of energy lines and piping systems, container maintenance, and emergency response to leaks or spills.

Employers must also implement safety measures to prevent, reduce, eliminate or control risks arising from the handling of hazardous chemical substances or mixtures thereof; provide appropriate personal protective equipment and training on its use; prohibit smoking and the consumption of food or beverages in handling areas; and control ignition sources. In addition, employers must have an emergency response plan addressing emergency scenarios, resources, designated personnel, evacuation routes, response procedures and emergency drills.

Training, Health Surveillance and Compliance Assessment

Occupationally exposed personnel must receive training and instruction at least every twelve months and whenever the quantities handled increase, new substances are introduced, or existing processes are modified or new processes are introduced. Training must cover hazards, control measures, safety signage, safety data sheets, safety procedures, personal protective equipment and the emergency response plan. Personnel responsible for emergency response must also receive training in first aid and in responding to chemical releases.

Employers must follow up on health surveillance for exposed employees in the event of an emergency. They must also oversee compliance with applicable safety procedures and measures by personnel of companies contracted to provide specialized services or carry out specialized work that falls outside the workplace's predominant business activity.

Employers may engage an accredited and approved inspection body to assess compliance with the NOM. The resulting compliance report will be valid for one year, provided that the conditions under which it was issued remain unchanged.

Entry into Force and Transitional Provisions

The NOM will enter into force three years after its publication in the DOF, on November 24, 2029. On that date, the previous NOM will cease to have effect pursuant to the Third Transitory Article. During the transition period, employers must comply with the following framework:

Stage	Date	Applicable Framework
Publication	November 24, 2026	Publication of NOM-005-STPS-2025 in the DOF.
Transition period	November 24, 2026, through November 23, 2029	Employers must comply with NOM-005-STPS-1998 or make the necessary adjustments to comply with the new NOM ahead of its entry into force.
Entry into force	November 24, 2029	NOM-005-STPS-2025 will enter into force, and NOM-005-STPS-1998 will cease to have effect.

During this period, employers who choose to comply with the new NOM ahead of its entry into force may seek assistance and guidance from the labor authorities in making the necessary adjustments, without being subject to penalties for non-compliance with the currently applicable NOM. We recommend using this transition period to review chemical substance inventories, safety data sheets, risk assessments, work procedures, safety signage, personal protective equipment and emergency response plans.

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