

September 2025



Key Regulatory Developments

September 2025

National Agency for Industrial Safety and Environmental Protection of the Hydrocarbon Sector

(Agencia Nacional de Seguridad Industrial y de Protección al Medio Ambiente del Sector Hidrocarburos or ASEA)

- **Mexican Official Standard NOM-020-ASEA-2024 Transportation of Natural Gas by Land Pipelines:** ASEA published NOM-020-ASEA-2024 on Sept. 1, 2025, to regulate the transportation of natural gas and ethane in gaseous state by land pipelines. This standard cancels NOM-007-ASEA-2016 and will enter into force on Feb. 28, 2026, granting a 180-day transition period for compliance and establishes the following:
 - technical requirements for the design, construction, operation and maintenance of pipelines
 - reinforces industrial, operational and environmental safety measures aligned with international standards American Society of Mechanical Engineers (ASME), American Petroleum Institute (API) and American Society for Testing Materials (ASTM).
 - applies nationwide and to areas under Mexican jurisdiction
 - introduces risk management criteria, pipeline integrity, anti-corrosion control, sectionalizing valves and emergency shutdown systems

Non-compliance may result in administrative sanctions by ASEA.

- **Mexican Official Standard NOM-019-ASEA-2024 Natural Gas Processing Facilities:** Published on Sept. 2, 2025, NOM-019-ASEA-2024 regulates natural gas processing facilities and replaces NOM-137-SEMARNAT-2013. The objective is to reduce industrial risks and improve air quality in operational areas, and includes the following:
 - establishes technical criteria for controlling sulfur compound emissions, operational safety and environmental protection
 - introduces stricter requirements for the design, operation and maintenance of processing complexes
 - strengthens atmospheric emissions oversight and requires implementation of continuous monitoring systems

Federal Executive

- **Sectoral Program for Environment and Natural Resources 2025–2030:** Published on Sept. 8, 2025, the Sectoral Program for Environment and Natural Resources 2025–2030 (PROMARNAT) aligns with the National Development Plan. The program promotes a model of sustainable humanism and establishes five strategic axis:
 - Ecosystem restoration
 - Climate action
 - Energy transition
 - Circular economy
 - Environmental governance

Stricter inspections, new obligations for the private sector and tax incentives for sustainable practices are anticipated. Community consultation, payment for environmental services and ecological compensation are also promoted. The program will be binding for federal agencies and will guide national environmental policy during the current six-year term.

August 2025

Ministry of Environment and Natural Resources

(*Secretaría de Medio Ambiente y Recursos Naturales* or SEMARNAT)

- **Response to Comments on Draft PROY-NOM-157-SEMARNAT-2023:** Published on Aug. 1, 2025, SEMARNAT issued its response to comments received on the draft amendment to NOM-157-SEMARNAT-2009, which establishes elements and procedures for implementing mining waste management plans. This publication confirms the transition to PROY-NOM-157-SEMARNAT-2023, incorporating adjustments resulting from technical, academic and institutional observations. The text was reorganized to improve coherence with the legitimate public interest objective. Definitions, technical criteria and environmental assessment procedures were strengthened. The working group considered several suggestions that improve regulatory clarity. The new version seeks to ensure comprehensive, safe and environmentally responsible management of mining waste.
- **Guarantee Fee for Non-Expiration of National Water Rights for Fiscal Year 2025:** Published on Aug. 13, 2025, the Ministry of Finance and Public Credit (SHCP) authorized the National Water Commission (CONAGUA), via official letter 349-B-141, to apply fees per cubic meter (m³) under the figure of "use charges" for the calculation and payment of the guarantee fee for non-expiration of national water rights corresponding to fiscal year 2025. This fee allows concessionaires and assignees to avoid expiration of their titles due to lack of use for two consecutive years. Rates vary according to type of use (potable, hydroelectric, aquaculture, recreational), source (surface or underground) and availability zone. Payments will be made via the Declar@gua system and concentrated in the Federal Treasury.

July 2025

National Agency for Industrial Safety and Environmental Protection of the Hydrocarbon Sector

(*Agencia Nacional de Seguridad Industrial y de Protección al Medio Ambiente del Sector Hidrocarburos* or ASEA)

- **General Rules for the Operation of ASEA's Electronic Filing Office:** Published on July 3, 2025, this agreement establishes new rules for managing procedures before the National Energy Commission (CNE). It aims to simplify administrative processes, reduce response times and standardize requirements. The Electronic Filing Office (OPE) is enabled as the main channel for submissions and applications for new permits, and structural modifications are temporarily excluded. The agreement will remain in effect until updated regulations for the energy sector are implemented.
- **Agreement to Simplify Response Times and Requirements for Retail Sale of Petroleum Products at Service Stations:** Published on July 11, 2025, in the *Official Gazette*, this agreement:
 - simplifies the process for obtaining retail sale permits for petroleum products at service stations

- modifies the official name of the procedure and reduces the maximum resolution period from 90 business days to 70 business days
- implements a single application form that is available on the CNE portal
- eliminates duplicate requirements and standardizes technical, fiscal and legal documentation
- requires proof of legal possession of the property, supply chain and shareholding structure

The technical report in accordance with NOM-005-ASEA-2016 remains mandatory. Applications in process will be resolved according to the regulations in force at the time of submission. The agreement will enter into force together with the regulations of the Hydrocarbons Sector Law and Energy Planning Law.

Federal Executive

- **Agreement Issuing Guidelines for Economic Development Poles for Wellbeing (PODECIBI):** Published on July 21, 2025, this agreement grants tax benefits to developers and companies operating in the Circular Economy Development Poles for Wellbeing (PODECIBI). The guidelines regulate the selection of properties, technical and legal requirements for developers and project validation criteria by the Ministry of Environment and Natural Resources (SEMARNAT). Mechanisms for allocation (bidding, competition or direct award), operating rules and grounds for revocation are established. Benefits include immediate investment deduction, tax credits and incentives for training and innovation. Companies must submit quarterly reports and meet verifiable environmental targets.
- **Amendment Decree on Tax Incentives in PODECIBI:** On July 31, 2025, the decree amending the one granting tax incentives in the PODECIBI was published. This decree expands tax benefits for developers and taxpayers operating in PODECIBI, incorporating a new requirement: additional deduction for training and innovation expenses may be applied if a commodatum contract is entered into with public institutions of upper secondary or higher education, granting free use of new fixed assets. The article regulating the additional deduction is amended, detailing the conditions of the commodatum. Immediate investment deduction is also permitted upon compliance with requirements. The composition of the Intersecretarial Promotion Committee is updated. The creation of a digital portal to facilitate administrative procedures has been established.

Ministry of Environment and Natural Resources

(*Secretaría de Medio Ambiente y Recursos Naturales* or SEMARNAT)

- **SEMARNAT Administrative Simplification Measures:** Published on July 25, 2025, this agreement establishes administrative simplification measures for 32 key SEMARNAT procedures, aiming to reduce requirements, merge procedures and digitize processes. Between one and 10 requirements are eliminated by procedure, with an average reduction of 40 percent. Digital receipt of documents via USB or electronic platform is enabled. Procedures such as the single environmental license are merged with the operating license. Response times are shortened (e.g., from 60 business days to 45 business days). Five new forms are issued, and 14 existing ones are modified. The agreement entered into force on Aug. 13, 2025.



Relevant Agreements

Energy

- **Agreement Establishing Requirements for Interconnected Self-Consumption Generation Permit (0.7 to 20 megawatts [MW]):** On Aug. 6, 2025, the National Energy Commission (CNE) published the agreement establishing requirements for obtaining the permit for interconnected self-consumption electricity generation for plants with capacity between 0.7 MW and 20 MW. The agreement:
 - applies to individuals, legal entities and public entities
 - requires submission of technical, legal, financial and social impact information
 - includes georeferenced location, energy backup, business plan and National Energy Control Center (CENACE) study
 - enables an official form and registration in the Single Citizen Portal
 - simplifies the procedure in accordance with the National Law to Eliminate Bureaucratic Procedures
 - enters into force with the regulations of the Electricity Sector Law and Energy Planning Law



What's Next?

National Commission for Regulatory Improvement

(Comisión Nacional de Mejora Regulatoria or CONAMER)

- **Agreement Establishing Simplification Actions and Incorporation into the Single Digital Water Procedures Window:** The purpose of this agreement is to establish simplification actions for procedures such as modification of title or permit, notice to request interruption of expiration of water rights related to unused water volumes and extension of concession, assignment and/or discharge permits in compliance with Article Fifth Transitory of the decree published in the *Official Gazette* on March 26, 2025, which provides that the National Water Commission will make public the procedures enabled in the Single Digital Water Procedures Window through agreements published in the same official medium.



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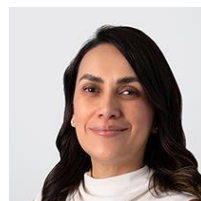
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