

Environmental Insights: Mexico

October 2025



Key Regulatory Developments

Ministry of Environment and Natural Resources

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

Agreement Establishing Simplification Actions and Incorporating the Specified Procedures into the Single Digital Water Procedures Window. The agreement, published on Oct. 1, 2025, introduces measures to streamline procedures related to national waters, integrating them into the single digital portal. Included procedures encompass title modifications, extensions and notices of interruption of expiration. The use of digital forms and advanced electronic signatures is promoted, while digitized handwritten signatures are permitted for specific agricultural cases. Requirements are simplified for agricultural plots under 100 hectares. Payments are processed via the Declar@gua platform and reflected in the portal within 72 hours. The authority has 60 business days to resolve applications, and users have 10 days to correct deficiencies. The agreement applies to individuals and legal entities holding concessions, assignments or discharge permits and entered into force on Oct. 8, 2025. Users are advised to prepare digital documentation and adjust internal procedures accordingly.

Mexican Official Emergency Standard NOM-EM-006-ASEA-2025: Transportation of Liquefied Petroleum Gas (LPG). The standard, published on Oct. 3, 2025, sets forth technical requirements for industrial, operational and environmental safety in the transportation of LPG via tank trucks and semi-trailers with tractor units. It is mandatory nationwide and aims to prevent risks following serious incidents. The standard mandates visible labeling, safety devices, speed control (maximum 80 km/h), active GPS and verifiable documentary evidence. Compliance must be demonstrated through records, photographs and certificates. The standard took effect the day after publication and remains valid for six months (extendable once). Companies must implement a formal plan with designated personnel, budget and timeline to avoid penalties and ensure operational continuity.

Mexican Official Emergency Standard NOM-EM-007-ASEA-2025: Distribution of LPG (Cancels NOM-007-SESH-2010 Vehicles for the Transportation and Distribution of LP Gas – Safety, Operation and Maintenance Conditions). The standard, published on Oct. 3, 2025, outlines technical requirements for industrial, operational and environmental safety in the distribution of LPG via tank trucks and delivery vehicles, repealing NOM-007-SESH-2010. It is mandatory nationwide and applies from the loading point to final delivery to the end user. It requires speed governors, active GPS, visible labeling and minimum safety equipment such as fire extinguishers and reflective signs. Operators must hold certification in occupational competency. Annual operation and maintenance reports are required, along with internal inspections and hydrostatic testing. The standard is valid for six months with phased compliance based on unit capacity and age.

Decree Issuing the Regulation of the Hydrocarbons Sector Law. The regulation, published on Oct. 3, 2025, comprehensively governs the value chain of the hydrocarbons sector, from exploration to commercialization. It reorganizes the powers among authorities: 1) Ministry of Energy (SENER) retains its guiding functions, 2) the Ministry of Finance and Public Credit (SHCP) handles economic and fiscal matters, and 3) the new National Energy Commission (CNE) assumes regulatory powers previously exercised by the Energy Regulatory Commission (CRE) and Hydrocarbons National Commission (CNH). Key definitions such as "significant social impact" and "prior consultation" have been introduced through this decree. New obligations for permit holders are established, such as traceability of the origin and destination of products and the prohibition of alteration or sale of adulterated products. Temporary intervention of companies is permitted for reasons of national security, disasters or public utility, as well as compensation in accordance with the Expropriation Law. Previous regulations are being repealed, and a new scheme for assignments and exploration contracts is established. The regulation entered into force on Oct. 4, 2025.

Decree Issuing the Regulation of the Geothermal Law. This regulation, published on Oct. 3, 2025, governs activities related to the exploration, exploitation and various uses of subsurface heat in Mexico. It establishes technical, environmental and financial requirements for obtaining permits and concessions. It introduces concepts such as exempt geothermal utilization and permits for diverse uses, facilitating small-scale projects. It strengthens the role of SENER as the guiding authority and creates a national cartographic registry of areas with geothermal potential. It promotes technological innovation, the conversion of oil wells and public-private collaboration. The Federal Electricity Commission (CFE) must prepare an annual portfolio of geothermal projects. Guidelines for safety, sustainability and control are included, consolidating a comprehensive legal framework for the orderly development of the sector. This regulation repeals the previous 2014 regulation and aligns with the objectives of the 2025 energy reform.

Decree Issuing the Regulation of the Electric Sector Law. The regulation, published on Oct. 3, 2025, governs the binding planning of the National Electric System (SEN), generation, storage, commercialization, transmission and distribution of electricity. It reinforces the prevalence of the state, establishing that the CFE must generate at least 54 percent of national energy. Three generation modalities are created: 1) distributed (up to 0.7 megawatts (MW)), 2) self-consumption (from 0.7 MW) and 3) generation for the market. Permits are simplified and powers are reorganized between SENER, the new CNE and the National Center for Energy Control (CENACE). Principles of energy justice, prior consultation and national content are incorporated. Mixed investment schemes with majority state participation are enabled. The regulation entered into force on Oct. 4, 2025.

Decree Issuing the Regulation of the Biofuels Law. This regulation, published on Oct. 3, 2025, governs all activities related to biofuels such as production, storage, transportation, import, export, commercialization, distribution and retail sales. It defines key concepts such as biodiesel, bioethanol, biogas, biomethane and bioturbosine, and establishes criteria for traceability and quality. It replaces the 2009 bioenergetics regulation and enters into force immediately. Its application corresponds to SENER, SEMARNAT and the Ministry of Agriculture and Rural Development (SADER), according to their respective competencies. The injection of biomethane into natural gas networks is provided, and fiscal and financial incentives are contemplated. The regulation promotes energy transition, sustainability and energy justice. It also establishes procedures for permits, including scientific and technological research. Interinstitutional coordination and binding planning for sector development are required.

Decree Issuing the Regulation of the Planning and Energy Transition Law. This regulation, published on Oct. 3, 2025, establishes binding planning for the energy sector, requiring plans, permits and concessions that align with the instruments defined by SENER. It introduces as a guiding axis the National Energy Transition Strategy,

together with the following plans: 1) Energy Transition and Security Plan (PLATEASE), 2) Sustainable Energy Development Plan (PLADESE) and 3) Hydrocarbons Sector Development Plan (PLADESHi), which sets short-term (six years), medium-term (15 years) and long-term (30 years) goals. It promotes sustainable energy use, reduces pollutant emissions and increases participation of clean energies. The National Energy Information System and Registry of High Consumption Users (UPAC) are created. Voluntary agreements for efficiency and decarbonization are recognized. The regulation strengthens interinstitutional coordination and seeks to provide legal certainty to national energy policy. It replaces previous regulations and aligns with the 2025 energy reform.

Decree Amending and Repealing Various Provisions of the Hydrocarbon Revenue Regulation. This decree, published on Oct. 3, 2025, updates the regulatory framework for the oversight of revenues derived from the exploration and extraction of hydrocarbons. The annual report of the SHCP is modified to include information on areas granted through exceptional contracts. SENER must provide technical support in case of tenders. The way fiscal terms of contracts are determined is redefined, allowing adjustments in response to global economic changes. Coordination between SENER, SHCP and the Mexican Petroleum Fund for contract management is reinforced. New monthly reporting obligations on production and location of operations are established. Additionally, articles that no longer align with the new legal structure of the energy sector are repealed. The objective is to improve transparency, efficiency and control in the management of petroleum revenues.



Relevant Agreements

Agreement by Which the CNE Repeals the Regulations Applicable to First-Hand Sales and the Asymmetric Regulation of Petróleos Mexicanos (PEMEX) and its Subsidiary Companies. This agreement eliminates the differentiated regime previously applicable to PEMEX regarding the commercialization of hydrocarbons, petroleum products and petrochemicals. It repeals the provisions issued by the now-defunct CRE, including price rules, open access and special reporting requirements. PEMEX is now subject to the general competition and regulatory regime applicable to all permit holders. First-hand sales no longer require approval or tariff control and shall be governed by the Regulation of the Hydrocarbons Sector Law. Existing contracts shall remain in force until their expiration. This agreement marks a transition toward a supervised competition model and strengthens national energy sovereignty.

Agreement of the CNE Publishing the Single Application Form Referenced in the Separate Agreement Simplifying the Maximum Response Time and Requirements for the Procedure for Retail Sales at Petroleum Product Service Stations. This form replaces previous models and standardizes the documentation required to obtain the permit, in compliance with the simplification agreement dated July 11, 2025. The procedure is conducted entirely through the Electronic Filing Office of the CNE. Duplicate requirements are removed and the maximum response time is reduced. The form includes nine sections covering applicant information, project details, property ownership, authorizations, products, traceability, technical specifications, payment of fees and legal declarations. It is aligned with the regulations of the Hydrocarbons Sector Law and the Law of Energy Planning and Transition. Its implementation requires permit holders to update internal processes and digitize technical and financial records.

Agreement Specifying the Name, Headquarters, and Territorial Jurisdiction of the Environmental Protection and Territorial Management Representation Offices of the Federal Attorney for Environmental Protection (PROFEPA) in the Federal Entities and in the Metropolitan Zone of the Valley of Mexico (ZMVM). The PROFEPA shall have representation offices in each federal entity and in the ZMVM. Auxiliary offices may be established in municipalities as they may be required. The offices shall exercise their powers in accordance with the internal regulations of SEMARNAT. Office holders must inform the Attorney's Office of

relevant matters and coordinate with local authorities. Offices located in coastal states shall have jurisdiction over marine and insular zones. Additionally, they must receive documentation related to complaints, claims and administrative procedures. The foregoing is in accordance with the following distribution:

Name of the Representation Office	Headquarters	Territorial Jurisdiction
Representation Office for Environmental Protection in the State of Aguascalientes	Aguascalientes	State of Aguascalientes
Representation Office for Environmental Protection in the State of Baja California	Mexicali	State of California
Representation Office for Environmental Protection in the State of Baja California Sur	La Paz	State of Baja California Sur
Oficina de Representación de Protección Ambiental en el Estado de Campeche	Campeche	State of Campeche
Representation Office for Environmental Protection in the State of Coahuila de Zaragoza	Saltillo	State of Coahuila de Zaragoza
Representation Office for Environmental Protection in the State of Colima	Colima	State of Colima
Oficina de Representación de Protección Ambiental en el Estado de Chiapas	Tuxtla Gutiérrez	State of Chiapas
Representation Office for Environmental Protection in the State of Chihuahua	Ciudad Juárez	State of Chihuahua
Representation Office for Environmental Protection in the State of Durango	Durango	State of Durango
Representation Office for Environmental Protection in the State of Guanajuato	Guanajuato	State of Guanajuato
Representation Office for Environmental Protection in the State of Guerrero	Acapulco	State of Guerrero
Representation Office for Environmental Protection in the State of Hidalgo	Pachuca	State of Hidalgo
Representation Office for Environmental Protection in the State of Jalisco	Guadalajara	State of Jalisco
Representation Office for Environmental Protection in the State of México	Toluca	State of Mexico (except municipalities of the ZMVM)
Representation Office for Environmental Protection in the State of Michoacán de Ocampo	Morelia	State of Michoacán de Ocampo
Representation Office for Environmental Protection in the State of Morelos	Cuernavaca	State of Morelos

Representation Office for Environmental Protection in the State of Nayarit	Tepic	State of Nayarit
Representation Office for Environmental Protection in the State of Nuevo León	Ciudad Guadalupe	State of Nuevo León
Representation Office for Environmental Protection in the State of Oaxaca	Oaxaca	State of Oaxaca
Representation Office for Environmental Protection in the State of Puebla	Puebla	State of Puebla
Representation Office for Environmental Protection in the State of Querétaro	Querétaro	State of Querétaro
Representation Office for Environmental Protection in the State of Quintana Roo	Cancún	State of Quintana Roo
Representation Office for Environmental Protection in the State of San Luis Potosí	San Luis Potosí	State of San Luis Potosí
Representation Office for Environmental Protection in the State of Sinaloa	Culiacán	State of Sinaloa
Representation Office for Environmental Protection in the State of Sonora	Hermosillo	State of Sonora
Oficina de Representación de Protección Ambiental en el Estado de Tabasco	Villahermosa	State of Tabasco
Representation Office for Environmental Protection in the State of Tamaulipas	Ciudad Victoria	State of Tamaulipas
Representation Office for Environmental Protection in the State of Tlaxcala	Tlaxcala	State of Tlaxcala
Representation Office for Environmental Protection in the State of Veracruz	Jalapa	State of Veracruz
Representation Office for Environmental Protection in the State of Yucatán	Mérida	State of Yucatán
Representation Office for Environmental Protection in the State of Zacatecas	Zacatecas	State of Zacatecas
Representation Office for Environmental Protection in the ZMVM	Tecamachalco, Naucalpan de Juárez	Mexico City and municipalities of the State of Mexico in the ZMVM

Agreement of the CNE Publishing the Format that Establishes the Requirements to Obtain a Generation Permit for Self-Consumption Interconnected to Power Plants with a Capacity Between 0.7 and 20 MW. The agreement simplifies the procedure for obtaining electric generation permits under the interconnected self-consumption modality. The format requires applicant information, technical characteristics of the project,

georeferenced location, energy backup, and social and technical impact studies. It eliminates the excessive documentation burden from the previous 2022 agreement. The procedure is carried out digitally and is integrated into the National Catalogue of Regulations, Procedures and Services. The CNE will evaluate applications in accordance with the new regulations of the electric sector.



What's Next?

National Water Commission

(*Comisión Nacional del Agua* or CONAGUA)

Initiative for the General Water Law and the Reform of the National Waters Law. The initiative for the General Water Law and the reform of the National Waters Law, submitted by President Claudia Sheinbaum to the Chamber of Deputies on Oct. 1, 2025, introduces the following significant changes compared to the current law:

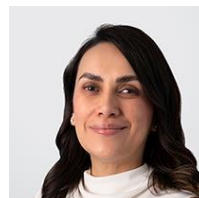
- The initiative proposes a restructuring of Mexico's water legal framework, aiming to guarantee the human right to water and sanitation as established in Article 4 of the Constitution. The new General Water Law defines the responsibilities of the federation, states and municipalities, recognizes community water systems as nonprofit service providers and promotes equitable and sustainable use of water resources.
- Regarding the reform of the National Waters Law, the initiative eliminates the possibility of transferring rights contained in concession titles between private parties. It also prohibits changes in water use and limits mechanisms such as the non-expiration guarantee fee, which may now only be applied twice to prevent hoarding.
- The powers of CONAGUA are strengthened to regulate water use and new schemes for concession allocation are established. Additionally, penalties for violations are increased, including fines of up to 50,000 Measuring and Updating Unit (UMA) and a new chapter on water-related crimes is incorporated.
- These initiatives seek to reaffirm water's role as a strategic national resource and to ensure access to it as a human right.

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