



EUROPEAN COMMISSION

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs

Ecosystems I: Chemicals, Food, Retail

F2. Bioeconomy, Chemicals & Cosmetics

CONCEPT NOTE

REALITY CHECK WORKSHOP

ON THE POSSIBLE SIMPLIFICATION OF CHEMICALS LEGISLATION – CLP (CLASSIFICATION, LABELLING AND PACKAGING OF SUBSTANCES AND MIXTURES)

FRIDAY 16 MAY 2025, 9.00 – 12:30

I. Introduction and objectives

The objective of Regulation (EC) 1272/2008 (the CLP regulation) is to ensure a high level of protection of health and the environment, as well as the free movement of substances, mixtures and certain articles. It requires economic operators to classify, label and package their hazardous chemicals appropriately before placing them on the market. The CLP Regulation implements in the EU the United Nations' Globally Harmonised System (GHS) and establishes legally binding hazard identification and classification rules. It also contains detailed labelling and packaging rules. Together with other EU legislation, it sets up rules to ensure that hazardous chemicals are safe when placed on the market.

The CLP regulation was amended by Regulation (EU) 2024/2865, which introduced numerous legislative changes aiming at improving communication of hazard-related information to users of chemicals, ensuring adequate classification rules as well as addressing identified legal gaps and uncertainties.

In the [Communication on implementation and simplification ‘A simpler and faster Europe’](#) the European Commission has committed itself to lighten the regulatory burden for people, businesses and administrations in the EU to boost prosperity and resilience of the EU. This workshop therefore aims at collecting the experiences of stakeholders (businesses, practitioners applying EU law, consumer and business associations as well as competent authorities) on the impact CLP rules have on their activities, identifying any unintended consequences of the newly introduced rules, and exploring possibilities for simplification, cost-savings and reduction of the administrative burdens.

II. Identified areas of simplification

Based on the input already received from stakeholders, the following areas of CLP regulation were identified as creating a heavy administrative burden and generating high costs and could benefit from regulatory streamlining and modernisation:

1. Mandatory formatting requirements, including minimum font sizes and line spacing for the labelling of hazardous chemicals introduced by the Regulation 2024/2865

The [Impact Assessment Report accompanying the proposal for an amending regulation](#) identified the need to improve communication of hazard-related information, including the legibility and readability of CLP labels. As a result, new formatting requirements, including minimum font sizes for different sizes of packaging, distance between the lines and colour of the text of the labels were introduced in the Regulation 2025/2865.

The estimations of the costs of compliance with new font sizes received from stakeholders show the additional costs for companies between 18-37 million euros per year, depending on a company size, and up to 60 million indicated by some big market players. Furthermore, according to stakeholders' assessment, the increase of the font sizes would lead to the drastic increase of the packaging, especially in certain countries with several official languages, which might not be in line with the objectives of packaging and packaging waste legislation.

The aim of the discussion is to analyse whether changes to the minimum font sizes and line spacing for the labelling of hazardous chemicals introduced by the Regulation 2024/2865 could be simplified, while at the same time ensuring that the chemical labelling information is legible.

The participants are invited to express their views as well as indicate other measures that could help to achieve better balance between the need to ensure the effective communication of hazard-related information to users of chemicals and administrative burden and costs for economic operators.

2. Rules on advertisements

Regulation 2024/2865 introduced new rules on advertisements that require any advertisement (including on radio, on social media, in promotional leaflets etc.) to indicate all hazard information, i.e. hazard pictogram, hazard statement, precautionary statement and EUH statement, together with invitation to always follow the label information. These rules were highlighted by stakeholders as disproportionate and going far beyond what is required of other industries, such as for pharmaceuticals, biocidal and plant protection products.

The current Article 48 of CLP regulation requires the advertisements for a hazardous substance to mention the hazard class concerned. For mixtures, the current Article 48 lays down obligations to mention the type of hazards only for the advertisements **that allow a member of the general public to conclude a contract for purchase without first having sight of the label**. This was to protect the recipients of hazardous mixtures, including consumers, **who would not be able to see the label information before the purchase**. However, Regulation 2024/2865 introduced Article 48a requiring all distance offers to indicate full CLP labelling information, thus ensuring that the final user is always informed about the hazards concerned and is always able to see (or be informed about) all label elements, including hazard pictograms, signal words, hazard and precautionary statements before buying a product.

The stakeholders, therefore, raised a question of the proportionality and the excessive cost of the extended requirements in new Article 48 for promotional communications, highlighting that a primary way of informing users about associated hazards is (and should remain such) the CLP label on the product, which users are always able to consult without buying a product (if

the product is sold via distance sales, full labelling information will be also presented to a user in the online offer) – and not the advertisements.

The participants are invited to express their views on the topic.

III. The outcome

This workshop is an opportunity to give feedback on the areas outlined above, as well as other topics the participants consider relevant, and to discuss measures to address them. The outcome of this workshop could be translated to a possible simplification proposal.

While we expect the participants to actively express their views and suggestions during the workshop, we also welcome written contributions and comments, and would be grateful for receiving them ideally by 31 May 2025 via email GROW-CHEM-MEETINGS@ec.europa.eu.