

Response ID
ANON-HSXE-8D7K-P

The Windsor Framework Democratic Scrutiny Committee would like your permission to publish your consultation responses.

Please indicate your publishing preference.

Publish response anonymously (this will remove all personal identifiers including name and organisation)

Does it appear likely that the EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?

Yes

Does it appear likely that the EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist? - Please expand on your answer

Because the additional costs and bureaucracy are seeing GB supplier withdrawal.
Reducing choice.

Does it appear likely that NOT APPLYING the EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?

No

Does it appear likely that NOT APPLYING the EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist? - Tell us why

NA

Does it appear likely that NOT APPLYING the EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist? - Tell us why

NA

Response ID
ANON-HSXE-8D7R-W

The Windsor Framework Democratic Scrutiny Committee would like your permission to publish your consultation responses. Please indicate your publishing preference. - consent

Publish response

What is your organisation (if any)? - Organisation

Chemical Industries Association

Does it appear likely that the EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist? - Significant Impact

Yes

Does it appear likely that the EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist? - Please expand on your answer

CIA welcomes the opportunity to comment further on potential impacts of the introduction of Regulation (EU) 2024/2865 ("the EU CLP Revision") in Northern Ireland, following previous discussions with the HSE and the Windsor Framework Task Force.

We support elements of the EU CLP Revision with the aims to improve protection of human health and the environment via labelling, and to provide clarity on several topics such as labelling responsibilities for online sales, and introduction of digital labelling for some label elements.

However, we have some concerns around the formatting rules for new labels. These rules are very stringent and specific, particularly the prescription of new minimum font sizes and spacing requirements that make current label sizes unusable for the majority of products. The increases implemented in the EU CLP Revision are impractical, with minimal (if any) real returns on label legibility, and they come with increased resource (time & cost) burdens. Companies may require new or updated software to design/generate these labels, or new label printing infrastructure to cope with increased label sizes.

It should also be noted that this is a divergence from GB CLP as it currently stands, which provides additional trade friction for the flow of products between GB and NI. Whilst these trade barriers are reflective of wider frictions that will be introduced in any GB -> EU supply

lines, and they are not exclusive to GB -> NI, nevertheless there is a danger that these will be more keenly felt in any supply chains where the supply is exclusively into NI. This is because the small market size may lead to withdrawal of product supply from the NI market, or at the very least, GB companies being unable to adhere to the cost-prohibitive new rules and subsequent burdens being pushed onto the NI recipient, who would be legally bound to reformat and relabel to maintain compliance with EU CLP.

Does it appear likely that NOT APPLYING the EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist? - not applying eu act

Unsure

Does it appear likely that NOT APPLYING the EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist? - Tell us why

We are unsure of the ramifications of opting to not apply the EU act in Northern Ireland, or whether this is an option, given that the NI Protocol / Windsor Framework implements EU CLP instead of GB CLP in NI. Whilst our concerns above still hold true, these would need to be weighed against the possible disruption to the functioning of the Framework and the need to avoid a hard border for trade products between NI and the Republic of Ireland.

Are there any other matters regarding the EU act that you wish to draw to the Committee's attention? Please note, any information provided should be of an evidential nature rather than a commentary. - Any other matters

No

Are there any other matters regarding the EU act that you wish to draw to the Committee's attention? Please note, any information provided should be of an evidential nature rather than a commentary. - Tell us why

N/A